

FY2014/2015 PERFORMANCE
PARTNERSHIP AGREEMENT
BETWEEN
ILLINOIS EPA AND REGION 5, USEPA

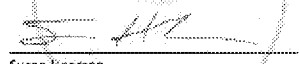
We are pleased to execute our fifteenth Performance Partnership Agreement. This agreement sets forth our mutual agenda for continued environmental progress and our expectations for the state/federal relationship. We have assembled a comprehensive document of goals, outcomes, strategies and resources for programs funded through the Performance Partnership Grant.

The execution of this agreement demonstrates our continuing commitment to environmental improvement that is both cost-effective and responsive to public concerns; and to finding better ways to accomplish our regulatory objectives.

Entered into on this 4/26/13



Lisa Bonnett
Director



Susan Kenman
Regional Administrator

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I. GENERAL PURPOSE AND CONTEXT

The Federal Fiscal Year 2014/2015 (FY14/15) Performance Partnership Agreement (Agreement) sets forth the mutual understandings reached regarding our state/federal relationship, and identifies the desirable environmental outcomes and performance expectations for the programs funded through the Performance Partnership Grant for the period of October 1, 2013 through September 30, 2015. The parties to this agreement are the Illinois Environmental Protection Agency (Illinois EPA) and Region 5 of the United States Environmental Protection Agency (Region 5). Illinois EPA and Region 5 entered into a separate Illinois Work Plan Agreement, dated February 4, 2013. This agreement contains references to that Work Plan, but does not supersede it. The parties have expressed their intention to update and extend the Work Plan Agreement through Calendar Year 2014.

A. State/Federal Environmental Partnership

This agreement is designed to be consistent with the "environmental partnership" as described in the National Environmental Performance Partnership System (NEPPS). The parties concur with the principles that are enumerated in the NEPPS and are proceeding in accordance with the framework shown therein.

B. Relationship of Agreement to Grants

Illinois EPA will operate under a Performance Partnership Grant (PPG) in FY2014/2015. The FY14/15 PPA continues the new format used in the FY12/13 PPA, to integrate USEPA Strategic Plan Goals and Objectives into the PPA document and to provide a more user friendly template. The templates attached to this agreement serve as specific work plans for the grants included in the Illinois PPG. The templates contain the three Essential Elements required by Grants Policy Issuance 11-03, and will also be used to report accomplishments on an annual basis. The measures and commitments in the work plans will be reviewed and updated as needed on an annual basis.

Illinois EPA operates under a PPG to gain more flexibility in use of federal funds, to reduce the administrative burden of having numerous, specific categorical grants/work plans, and to continue some key resource investments in priority activities. To best achieve the administrative benefits of a PPG, fewer grant actions and awards are desirable. However, where an issue is identified in a single media program, Region 5 will move to award the remaining resources while seeking to resolve the issue. Both agencies commit to timely identification and appropriate level of engagement on all such issues.

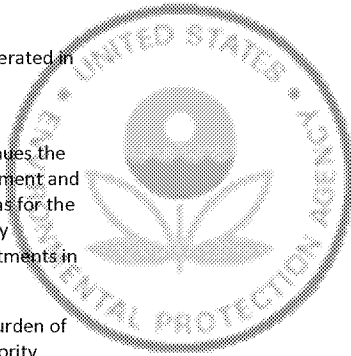
The parties also recognize that some specific project grants will continue in effect and operate in concert with this Agreement. The FY14/15 federal Performance Partnership Grant to Illinois EPA includes the following programs for which this agreement serves as the program commitment:

1. Air pollution control program (CAA, Sec. 105)
2. TSCA compliance assurance
3. Hazardous waste management program
4. Underground injection control program
5. Water pollution control program (CWA, Sec. 106)
6. Public water system supervision program
7. Nonpoint source pollution control program (CWA, Sec. 319) (TMDL)

Non-PPG grant activity covered in the agreement includes components from the following sources:

1. Title V permitting and compliance activities under the Clean Air Act amendments.
2. Midwest Clean Diesel Initiative

In past agreements a separate section entitled Joint Environmental Priorities has been included to highlight and focus attention and resources to mutually concerned areas of interest. Joint Environmental Priorities did not receive additional funding. Joint Environmental Priorities continue to be areas of highlighted concern. Therefore Joint Environmental Priorities have been incorporated into the individual bureau workplans.



Congress requires USEPA to negotiate a fair share objective with each state for procurement dollars covering supplies, construction, equipment and services. The current negotiated rates require, to the fullest extent possible, that at least 18 percent of federal funding for prime and subcontracts awarded in support of USEPA programs be made available to businesses or other organizations owned or controlled by socially and economically disadvantaged individuals, including women and historically black colleges and universities, based on an assessment of the availability of qualified minority business enterprises (MBE) and women-owned businesses (WBE) in the relevant market. Accordingly, for any grant or cooperative agreement awarded in support of this agreement, the parties agree to ensure that a fair share objective will be made available to MBEs and WBEs.

C. Joint Planning and Evaluation Process

The parties believe it is important to clearly articulate how all the components of the performance partnership are interrelated and sequenced. We will carry out the following joint planning and evaluation process, a two-year agreement covering FY14/15.

Actions

	<u>FY2014</u>	<u>FY2015</u>
Finalize FY14/15 Agreement	September 2013	
Senior Management Mid-Course Meeting	July 2014	
Mid-Course Updates	September 2014	
Illinois EPA Annual Performance Partnership Grant Report	December 2013	December 2014
Region 5 Evaluation of Annual Performance Partnership Grant Report	February 2014	February 2015

Throughout this agreement and in the attached documents, the timeframe is throughout FY2014/2015, unless specific timing/milestones are otherwise noted.

The Annual Performance Report for the PPG is a key component of the performance review. In addition, each media office has a documented post award management process, which they will continue to follow. These processes provide for periodic program meetings, conference calls, and program and file reviews, as appropriate. Finally, the two agencies have also developed a Reporting Requirement Inventory, which documents the various reporting requirements associated with grants and programs due to statutes, regulations and/or other policies and agreements. Illinois EPA will continue to fulfill these reporting requirements as outlined in the Inventory, unless a specific item is raised and/or renegotiated. All relevant information is taken into account as part of the joint evaluation process.

Another element in this joint evaluation process is the Senior Management Planning meeting, and the corresponding mid-year check-in meeting. It is expected that national program guidance should be available well before these meetings, allowing for identification of any critical commitment concerns. In addition, one agenda item for these meetings will be a senior level discussion of performance highlights and areas of concern. These discussions will be documented via joint meeting notes.

II. Enforcement and Compliance Assurance

Compliance and enforcement activities to be accomplished during the term of the FY14/15 Agreement are included in the individual media program plans. However, a summary of Region 5 and Illinois EPA roles in compliance and enforcement is helpful.

The following points serve as a foundation for the Region 5 and Illinois EPA relationships in respect to compliance and enforcement activities:

- Apply the most effective use of tools to encourage and maintain the compliance of sources of all sizes. This would include compliance assistance, administrative and/or civil enforcement, and criminal enforcement.
- Use joint up-front planning to coordinate priorities, maximize agency resources, avoid duplication of efforts, eliminate surprises, and institutionalize communication.
- Manage for environmental results which support each Agency's environmental goals and objectives,
- Ensure that compliance and enforcement information is complete, accurate, and timely consistent with Region 5 and Illinois EPA policies.



Under this Agreement, Region 5 and Illinois EPA retain their authorities and responsibilities to conduct compliance assistance, compliance monitoring, and enforcement. These activities will be conducted in the spirit of cooperation and trust. Specific compliance and enforcement data needs will be discussed and shared per each Agency's applicable policies and regulations.

In FY14, Region 5 will be conducting a review of Illinois EPA's Clean Air Act (CAA), and Clean Water Act (CWA), and Resource Conservation and Recovery Act (RCRA) compliance and enforcement programs. Both Region 5 and Illinois EPA are responsible for ensuring that agreed-upon follow-up actions that result from the review are carried out in a timely and effective manner. Certain actions may be addressed, as appropriate, through program workplans under the PPA.

III. Quality Management Plan

All data reported under this agreement will be quality assured and the Illinois EPA will continue to operate in accordance with its Quality Management Plan (QMP), which was approved by Region 5 on February 28, 2013. The QMP will be effective through February 27, 2018. The QMP encompasses Agency-wide and Bureau-specific QA processes for environmental data operations. The QMP will be updated as needed, and changes will be submitted to Region 5 for approval.

In addition, Quality Assurance Project Plans (QAPPs) will be developed as needed in each Bureau for project specific initiatives. Illinois EPA will continue to approve project-level QAPPs under this performance partnership agreement except for Superfund pre-remedial and remedial programs and the Superfund removal program. Illinois EPA will submit program-level QAPPs to Region 5's Land and Chemicals Division for the Leaking Underground Storage Tank (LUST) and Resource Conservation and Recovery Act (RCRA) Subtitle C inspection programs. U.S. EPA competitive assistance agreements under, but not limited to, the Great Lakes Restoration Initiative (GLRI) and Exchange Network Programs shall require the submission of project-level quality documentation for U.S. EPA review and approval as specified in the assistance agreement terms and conditions.

Region 5 is required to assess the implementation of the approved quality systems as well as extramural agreements which U.S. EPA provides financial assistance. Beginning with the approval of the revised Illinois EPA QMP, Illinois EPA shall submit complete signed electronic (i.e. pdf) copies of all self-approved QAPPs to Region 5 on a quarterly basis to facilitate these assessments. In addition, Illinois EPA will submit an annual letter (by January 31 of each year beginning in 2014) to Region 5 each year which:

- identifies any minor revisions needed and/or incorporated into the QMP during the preceding year;
- confirms that the QMP approved by Region 5 is still in effect; and
- lists all QAPPs, by environmental program, which were self-approved by Illinois EPA during the preceding year.

EPA Region 5 Response: Illinois EPA has satisfied its commitment for the FY 2014/2015 PPG through the submission of annual QA letters to Region 5 received on January 22, 2014, January 30, 2015 and January 27, 2016. These submissions stated that the QMP approved by Region 5 on February 28, 2013 was still in effect and reviewed by IEPA for revisions. The submissions also included pdf copies of QAPPs which were self-approved by Illinois EPA during the preceding year.

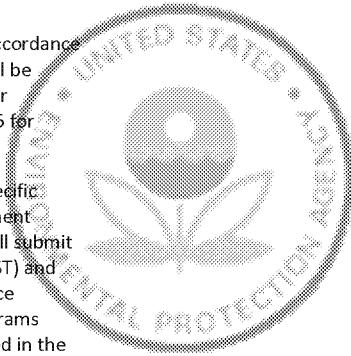
IV. Dispute Resolution Process

Illinois EPA and Region 5 will use an agreed upon dispute resolution process to handle the conflicts that may arise as we implement our environmental programs and will treat the resolution process as an opportunity to improve our joint efforts and not as an indication of failure.

A. Informal Dispute Resolution Guiding Principles

Illinois EPA and Region 5 will ensure that program operations:

- Recognize conflict as a normal part of the State/Federal relationship.



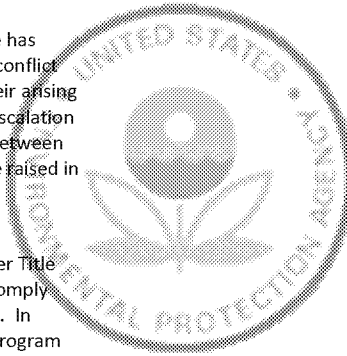
- Approach disagreement as a mutual problem requiring efforts from both agencies to resolve disputes.
- Approach the discussion as an opportunity to improve the product through joint efforts.
- Aim for resolution at the staff level, while keeping management briefed. Seriously consider all issues raised but address them in a prioritized format to assure that sufficient time is allocated to the most significant issues.
- Promptly disclose underlying assumptions, frames of reference and other driving forces.
- Clearly differentiate positions and check understanding of content and process with all appropriate or affected parties to assure acceptance by all stakeholders.
- Document discussions to minimize future misunderstandings.
- Pay attention to time frames and/or deadlines and escalate quickly when necessary.

B. Formal Conflict Resolution

There are formalized programmatic conflict resolution procedures that need to be invoked if the informal route has failed to resolve all issues. 40 CFR 31.70 outlines the formal grant dispute procedures. There is also an NPDES conflict resolution procedure. Generally, disputes should be resolved as quickly as possible but within two weeks of their arising at the staff level. When there is no resolution and the two weeks have passed, there should be a comparable escalation in each organization, accompanied by a statement of the issue and a one-page issue paper. A conference call between the parties should be held as soon as possible. Disputes that need to be raised to a higher level should again be raised in comparable fashion in each organization.

V. Reporting

Information will continue to be reported to Region 5 and the National Data Systems. Programs authorized under Title 40 for which the Illinois EPA receives or wishes to receive reports or documents electronically must meet and comply with the Cross-Media Electronic Reporting Regulation (CROMERR), Part 3, Title 40 effective November 11, 2006. In accordance with the CROMERR regulation before the implementation of such reporting, the designated State program system must be approved by EPA.



Attachment A: Bureau of Air

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
USEPA Strategic Goal: 1 – Taking Action on Climate Change & Improving Air Quality				
USEPA Strategic Objective 1.1: Address Climate Change. Reduce the threats posed by climate change by reducing greenhouse gas emissions and taking appropriate actions				
Work Plan Outputs/Measures/Outcomes – Air Toxics – Toxics & Global Atmosphere				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work collaboratively to address climate change and reduce greenhouse gas.	Kevin Greene or Jim Ross, Illinois EPA Melissa Hulting or Erin Newman, EPA	Both Illinois EPA and EPA continue to track and take appropriate measures on national, regional and local levels on climate change. Both agencies have committed to an open exchange of information between the agencies as a top priority.	2014 Status: Ongoing. Both Illinois EPA and EPA continue to track and take appropriate measures on national, regional and local levels on climate change. Both agencies have committed to an open exchange of information between the agencies as a top priority. The Agencies continue to work together with the release of the President's Climate Action Plan and Clean Power Plan, aka, 111(d). Illinois EPA is analyzing 111(d) goals and State Plan requirements. Illinois EPA is conducting and participating in outreach to stakeholders and discussing and reviewing available options in the development of a State Plan to meet 111(d). 2015 Status: Ongoing. Illinois EPA and USEPA continue to track and

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				take appropriate measures on national, regional and local issues on climate change. Illinois EPA has formed an internal team to analyze the final federal Clean Power Plan (CPP) rule which was released on August 3, 2015. Illinois EPA is participating in numerous state, regional and national calls and webinars regarding the CPP and is a member of two multi-state initiatives, the Midcontinent States Environmental and Energy Regulators (MSEER) and a similar effort with the PJM States, which are exploring multi-state coordination on the CPP. Illinois EPA continues to hold stakeholder meetings and calls regarding the CPP. Illinois is evaluating the final rule and weighing its options.
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
USEPA 2011-2015 Strategic Outcomes – Reduce Criteria Pollutants and Regional Haze				
Work Plan Outputs/Measures/Outcomes – Federal Vehicle and Fuels Standards and Certification – Control Strategies				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Work with EPA in preparing SIPs and developing, implementing, and transitioning mobile source control strategies such as I/M, OBD, and state fuel programs.	Chris Demeroukas, Chuck Gebhardt, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	VIM The Illinois EPA has an ongoing contract with Applus Technologies Inc. to continue On-Board Diagnostics (OBD) vehicle emissions testing in Illinois' ozone non-attainment areas. This	2014 Status: Ongoing. Current contract provides testing through April 2015. Illinois EPA is reviewing options for continuing testing services after that time. Revisions to the ozone SIP for changes in the VIM program were

		<p>contract provides testing through April 30, 2015.</p> <p>Work to develop I/M SIP-based motor vehicle emissions modeling during 2014 and 2015 for new ozone standards.</p> <p>Mike Hills, Illinois EPA Pamela Blakley, Frank Acevedo, EPA</p> <p>Continue to work with Region 5 in obtaining guidance from OTAQ concerning compliance with and revisions to 40 CFR Part 51, Subpart S – Inspection/Maintenance Program Requirements.</p> <p><u>Fuels:</u> The Illinois EPA submitted a SIP revision to Region V to rescind the State gasoline volatility requirements that were repealed by the Illinois Pollution Control Board. The Illinois EPA will work with Region V to provide any additional information necessary for their processing of the SIP revision request.</p>	<p>approved by USEPA and published in the Federal Register on August 13, 2014. The approval is effective September 12, 2014.</p> <p>Indiana filed a petition with the U.S. Court of Appeals for the Seventh Circuit on October 9th objecting to USEPA's approval of Illinois' ozone SIP revisions for our I/M program (State of Indiana vs. EPA, et al, US APP CA7 14-3214). Illinois EPA will monitor this and will be available to discuss with USEPA as requested.</p> <p>USEPA issued a proposed rule and direct-final rule approving the SIP revision on October 6, 2014. No comments were received, so the approval will take effect on December 5, 2014.</p> <p>2015 Status: Ongoing. Reached an agreement with Applus Technologies to continue testing services through October 31, 2016.</p> <p>Indiana's petition with the U.S. Court of Appeals to the Seventh Circuit objecting to USEPA's approval of Illinois' ozone SIP revision for our I/M program (State of Indiana vs. EPA, et al, US APP CA7 14-3214) was denied August 7, 2015.</p> <p>EPA Response: The IEPA and the Illinois Secretary of State's office announced temporary policy</p>
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				<p>changes on February 9, 2016 regarding vehicle emission test notification and vehicle license plate renewal procedures. Beginning March 1, 2016, the Illinois Secretary of State temporarily allowed license plate renewals for vehicle owners who have not complied with the I/M test requirement. In a letter dated February 19, 2016, EPA requested additional information from IEPA to better evaluate the implications associated with the state's announcement, as this action raises serious concerns regarding Illinois' ability to comply with federal and state requirements pertaining to the I/M program. EPA is pleased that Illinois will resume regular vehicle I/M compliance procedures effective June 1, 2016. However, we remain concerned that we have yet to receive your assessment of the effects of the temporary changes to your I/M program on air quality and Illinois' plan for addressing vehicles that did not receive the required tests as requested in our February 19, 2016 letter to IEPA.</p> <p>In the February 19, 2016 letter, EPA also requested that the IEPA submit the overdue I/M summary data reports for 2014 and 2015, as required under 40 CFR 51.366, as soon as possible. On March 1, 2016, IEPA submitted the overdue I/M</p>
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				emission testing reports. EPA strongly encourages the Illinois EPA to submit future annual I/M summary data reports to EPA by July of each year as required by 40 CFR 51.366.
	Work with local Metropolitan Planning Organizations, EPA, and state and federal transportation agencies in future conformity determinations as needed.	Darwin Burkhart, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will continue its ongoing role as an active participant in the transportation conformity consultation process. It will continue to work collaboratively with the Chicago Metropolitan Agency for Planning and the East West Gateway Council of Governments on future conformity determinations.	2014 Status: Illinois EPA is continuing to be involved in the transportation conformity consultation process and work collaboratively with the Chicago Metropolitan Agency for Planning and the East West Gateway Council of Governments on transportation conformity determinations. 2015 Status: Ongoing.
	Continue to develop and submit control strategy SIPs and maintenance plans with motor vehicle emission budgets based on MOVES.	Mike Hills, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will work on the development of required on-road mobile source emissions estimates and, if necessary, potential control measures for inclusion in SIPs addressing the 2008 8-hour ozone and annual PM2.5 NAAQS.	2014 Status: Illinois EPA staff will run the MOVES model as necessary to meet the requirements of submitting the periodic inventory to USEPA. No work on this is necessary until the 2015 inventory is submitted. DMSP: Illinois EPA developed and submitted to USEPA a revision to the Chicago 1997 8-hour ozone Maintenance Plan revising the motor vehicle emissions budgets used in Transportation Conformity determinations. USEPA approval of the proposed revisions was approved in October 2014.

				<p>2015 Status: The Illinois EPA will continue to work on the development and quality assurance of required on-road motor vehicle emissions estimates for required 8-hour ozone and annual PM2.5 base year inventories and possible control strategy SIPs using MOVES2014a.</p>
	Work on replacement of conformity consultation MOUs, so that states can use the flexibility and be consistent with federal transportation conformity rules.	Mike Hills, Illinois EPA Pamela Blakley, Michael Leslie, EPA	The Illinois EPA will be coordinating with the Chicago Metropolitan Agency for Planning, the East West Gateway Council of Governments and the Illinois Department of Transportation to develop either new MOUs or regulations dealing with the transportation conformity consultation requirements.	<p>2014 Status: Illinois EPA is currently developing a draft Transportation Conformity Memorandum of Agreement for review by USEPA and the respective consultation partners in the Chicago and Metro-East St. Louis areas.</p> <p>2015 Status: Illinois EPA is continuing its work in drafting a Memorandum of Agreement as part of the Transportation Conformity process in coordination with the Chicago Metropolitan Agency for Planning and the East-West Gateway Council of Governments.</p>
	Work with EPA to develop creditable mobile source programs.	Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo EPA	The Illinois EPA completed its Stage II hearings with the Pollution Control Board and will be submitting a SIP amendment in 2013 to stop the implementation requirements and to begin decommissioning. All Chicago area gasoline facilities must decommission their Stage II equipment by the end of 2016.	<p>2014 Status: Stage II Program-The Illinois PCB adopted the amended rules on December 19, 2013. The ozone SIP amendment was sent to USEPA Region 5 on January 17, 2014. Region 5 proposed approval of the SIP revision in the Federal Register on August 13, 2014. However, comments were received and it is anticipated that USEPA will withdraw the proposed approval and develop a response to the comments.</p>

				<p>2015 Status: To date, 1,050 gasoline facilities have either completed decommissioning or are in the process of decommissioning their Stage II equipment. This represents about 50 percent of the number of facilities with Stage II in the Chicago area.</p>
		Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo, EPA	The Illinois EPA will continue the Tank Truck Certification program. Over 4,000 gasoline tanker trucks get their annual pressure vacuum vapor recovery test to check for Stage I emissions.	<p>2014 Status: For efficiency, a program specific email account was established to allow for electronic paperwork submissions and enhanced interactions with tank truck drivers and operating companies.</p> <p>2015 Status: Ongoing.</p>
	Work with EPA to develop and continue voluntary mobile source programs and initiatives.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue chairing the Chicago Area Clean Cities coalition and work to obtain federal grants to provide funding for heavy-duty fleets, taxi companies, and other niche fleets to switch to a clean fuel. In addition, the coalition will continue its outreach to fleets and the general public on the benefits of using propane, natural gas, and electric vehicles, as well as biofuels.	<p>2014 Status: Illinois EPA received a \$3 million CMAQ award for medium- and heavy-duty fleets to implement natural gas and propane vehicles in the Chicago area. There is increasing interest for school districts to purchase propane school buses as 6 school districts in Illinois now use propane in their bus fleet.</p> <p>The Illinois EPA received \$150,000 in DERA 2014 funds for the implementation of diesel emission reduction projects within the state. Illinois EPA has completed the required Intergovernmental Agreement with the Illinois Department of Transportation (DOT) to allow issuance of sub-grants to</p>

				<p>implement this program.</p> <p>2015 Status: The coalition continues to help promote our Clean Diesel and Green Fleet funding to various types of fleets, including school districts, local governments, and businesses. A special emphasis has been on natural gas and propane trucks and buses, reducing idling, and obtaining additional federal grants.</p>
		<p>Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, USEPA</p>	<p>The Illinois EPA will continue the Illinois Alternate Fuels Rebate Program to support AFV purchases and certified conversions for both Illinois fleets and the general public. Outreach activities in coordination with Chicago Area Clean Cities will continue.</p>	<p>2014 Status: For the past program year (Feb. 1, 2013 through Jan. 31, 2014) over \$6.7 million in rebates were issued to 1,610 applicants for 1,354 electric, 160 natural gas, and 184 propane vehicles. In addition, 326 vehicles received E85 fuel rebates and 274 diesel trucks/buses received biodiesel fuel rebates. Chicago Area Clean Cities continues to host outreach events.</p> <p>2015 Status: Program remains suspended.</p>
		<p>Darwin Burkhart, Illinois EPA Pamela Blakley & Anthony Maietta, EPA</p>	<p>The Illinois EPA is enhancing the Illinois Green Fleets Program by partnering with Chicago Area Clean Cities in recognizing more "green fleets," conducting comprehensive annual surveys of participating fleets, and providing more outreach and networking opportunities.</p>	<p>2014 Status: The Illinois Green Fleets Program designated nine more "Illinois Green Fleets." These included Menards, City of Springfield, McHenry County Conservation District, Homewood Disposal Service, Rock River Disposal (Rockford), Turano Baking Co., Alpha Baking Co., Windy City Limousine, and Amerigas Propane. More fleets will likely be designated later this</p>

				<p>year.</p> <p>2015 Status: With 12 projects currently underway for the implementation of 78 natural gas and propane vehicles utilizing CMAQ Green Fleet funding, additional business and government green fleets can be recognized in 2016.</p>
Joint Priority	Continue to support the Midwest Clean Diesel Initiative (MCDI) including the management of state clean diesel grants, active involvement in state clean diesel coalitions, continued support of the Smartway program, and the promotion, generation and implementation of clean diesel funding, programs, projects, and policies.	Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to seek additional funding and implement projects for the Illinois Clean Diesel Grant Program, especially Congestion Mitigation and Air Quality (CMAQ) Improvement funding.	<p>2014 Status: In CY2013 and CY2014, Illinois EPA provided over \$2 million in clean diesel grants for 37 applicants affecting 704 vehicles and engines. These included school buses, marine tugs, long-haul trucks, and locomotives. Illinois EPA was awarded \$3 million in CMAQ funds for medium- and heavy-duty natural gas and propane vehicles (re: Chicago Area Green Fleet Grant Program) and still has CMAQ funds for clean school buses and engine repowers. The agency also coordinated with Indiana Harbor Belt Railroad for the implementation of 31 natural gas locomotives operating in the Chicago area.</p> <p>The Illinois EPA was awarded \$652,000 for the repower of eight marine engines operating in the Metro-East St. Louis area.</p> <p>2015 Status: In 2015, for the three CMAQ funds and 2014 DERA, Illinois EPA conducted 20 clean diesel projects and awarded \$1,756,181 in</p>

				cleaning up 196 vehicles or off-road equipment units. As noted in the Mid-Year status, we received \$7 million in additional CMAQ funding for our Green Fleet Grant program and \$2.7 million in CMAQ to repower four locomotives with Tier 4 engines.
		Darwin Burkhart, Illinois EPA Pamela Blakley, Anthony Maietta, EPA	The Illinois EPA will continue to chair the Illinois Clean Diesel Workgroup, which assists the agency in soliciting projects and conducting outreach.	<p>2014 Status: The Workgroup held a conference call to discuss the latest funding awards and clean diesel/alternate fuel vehicle opportunities in Fall 2014.</p> <p>2015 Status: Illinois EPA is coordinating with workgroup members in identifying one or more projects for our 2015 DERA fund, as well as continuing to find interested applicants for our CMAQ grant funds.</p>
Work Plan Outputs/Measures/Outcomes – NAAQS Ambient Air Monitoring				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Operate monitors for NAAQS pollutants, NCore, and PAMS according to 40 CFR Part 58, approved monitoring plans, and/or grant agreements including Quality Management Plan (QMP) and Quality Assurance Project Plan (QAPP) that meets all quality assurance and quality control regulatory monitoring	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	The Illinois EPA will submit the annual air monitoring network plan for the next calendar year. The 2014 Illinois EPA monitoring network plan was submitted to Region 5, following a 30 day comment period.	<p>2014 Status: The 2015 Illinois EPA monitoring network plan was submitted to Region 5 on October 2, 2014, following a 30 day comment period.</p> <p>USEPA conducted an audit of Cook County Department of Environmental Control's (CCDEC) monitoring and lab operations in November 2013. Several deficiencies were found, in</p>

	<p>requirements as stipulated in 40 CFR Part 58, Appendix A and guidance set forth in Quality Assurance Handbook of Air Pollution Measurement Systems Volume II (dated May 2013).</p>		<p>particular in the area of CCDEC's PM2.5 lab operation. As a result, PM2.5 data quality for several years (i.e., 2011-2013) is not usable for NAAQS determinations. CCDEC has submitted a Corrective Action Plan to USEPA to address the audit findings. The USEPA provided comments on the plan, making additional recommendations, on August 20, 2014. USEPA and Illinois EPA are working closely to address these issues.</p> <p>Illinois EPA is evaluating several options to address its ongoing concerns with CCDEC lab and monitoring program. Options regarding the CCDEC lab include working with CCDEC to correct lab deficiencies or using an alternative lab. Illinois EPA will address how CCDEC is utilized and what functions CCDEC shall perform for Illinois EPA going forward under the Intergovernmental Agreement (IGA) between the parties. The IGA is currently being finalized. In this regard, Illinois EPA is also analyzing funding for CCDEC.</p> <p>2015 Status: The 2016 Illinois EPA monitoring network plan was submitted to Region 5 on October 28, 2015, following a 30 day comment period.</p>
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				EPA Response: EPA conducted a comprehensive Technical System Audit of IEPA in April 2016. While the audit showed many improvements have occurred over the last few years, EPA did identify significant issues with IEPA's PM10 gravimetric laboratory. EPA's audit report will provide further details on the nonconformities, which IEPA will address through appropriate corrective actions.
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Operate all NAAQS, PAMS, NCore monitors and submit the data along with the QA data to the AQS according to required schedule.	<p>2014 Status: Ongoing. Issues currently exist with PM2.5 data quality for calendar years 2011-2013 due primarily to CCDEC lab deficiencies. Illinois EPA and USEPA are working closely in regards to PM2.5 data usage and availability. All other data is being submitted to AQS according to the required schedule.</p> <p>2015 Status: Ongoing. All data is being submitted to AQS according to the required schedule.</p>
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Certify NAAQS pollutant data, PAMS, NCore and toxics data in AQS and provide documentation according to required schedule.	<p>2014 Status: Illinois EPA is meeting the required schedule for certification of data.</p> <p>2015 Status: Illinois EPA is meeting the required schedule for certification of data. Early-certified ozone data was submitted on December 3, 2015.</p>
		David Bloomberg or his designee, Illinois EPA	Illinois EPA will install and begin operation of the first Near Road	2014 Status: Illinois EPA is in the process of an emergency

		Loretta Lehrman, Marta Fuoco, EPA	Site in the Chicago MSA by January 1, 2014 (as required to approve the 2014 monitoring network plan). Continue planning for the next phase of the near road sites due Jan 1, 2015. Purchasing any trailer/monitors needed for second site when funding is provided by USEPA.	<p>procurement for both sites and hopes to install the first monitors in early 2015.</p> <p>This process has been unfortunately delayed due to property access issues with site 2 that Illinois EPA is working to remedy.</p> <p>2015 Status: Illinois EPA has finalized a contract for the Near-Road monitor sites and expects to have the sites operational by Spring 2016.</p>
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will work to install and begin operation of the first Near Road Site in the Chicago MSA by January 1, 2014. Should the January 1, 2014 deadline be missed, Illinois EPA will submit to USEPA a new schedule with milestones and completion dates for this required site. Illinois EPA will continue planning for the next phase of the near road sites due Jan 1, 2015. Purchasing any trailer/monitors needed for second site when funding is provided by USEPA.	<p>2014 Status: Illinois EPA is in the process of a procurement for both sites and hopes to install the monitors in early 2015. Illinois EPA has been working closely with USEPA on this issue. This process has been unfortunately delayed due to property access issues with site 2 that Illinois EPA is working to remedy.</p> <p>2015 Status: Illinois EPA has finalized a contract for the Near-Road monitor sites and expects to have the sites operational by Spring 2016.</p> <p>EPA Response: IEPA did not complete this commitment within the period of this agreement nor by the CFR deadlines of January 1, 2014 and January 1, 2015, respectively. The installation of these two monitoring sites is funded by a stand-alone grant, which has been extended for a fourth time through September 1, 2016.</p>

				IEPA has provided a revised timeline that commits to the installation of these monitors by this date. EPA plans to perform advanced monitoring of this grant and is requiring monthly status updates on progress.
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Install lead monitor at Mittal Steel as required by 40 CFR Part 58 Appendix D 4.5. Install special purpose lead monitor at Johnson Controls as approved in the 2013 monitoring network plan.	2014 Status: Both lead monitors were installed in the 4 th quarter of 2013 and are operating. 2015 Status: Both lead monitors were installed in the 4 th quarter of 2013 and are operating.
		David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Install and operate a continuous PM2.5 monitor at the Bondville NCore site as required in the 2013 network plan.	2014 Status: In June 2014, Illinois Water Survey informed Illinois EPA that the originally agreed upon site was no longer usable due to perceived interference with other nearby studies. An alternative site was identified on same property and minor amendments to the agreement with Illinois Water Survey were made to reflect the new site. Final amended agreement was signed-off by both in August 2014. Site preparation is near completion with the platform being completed in November and electrical installation ongoing. Further, the monitor has been ordered and receipt of the monitor is expected shortly. We anticipate completion of installation and operation of the monitor by the

				end of 2014. 2015 Status: Installation was completed and operation began at the end of 2014.
	Illinois EPA shall continue to coordinate the Illinois Ambient Air Monitoring Network with Cook County Department of Environmental Control	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide technical directives and assistance to Cook County Department of Environmental Control, submit monitoring data collected by Cook County, include Cook County monitoring network in the annual network plan.	2014 Status: Illinois EPA is currently in discussions with CCDEC and USEPA and is near finalization on changes needed in the Intergovernmental Agreement to ensure data quality and proper network operation. Illinois EPA is evaluating how CCDEC will be used going forward and changes in functions performed by CCDEC for Illinois EPA and funding are likely. Issues currently exist with PM2.5 data quality for calendar years 2011-2013, as previously identified. 2015 Status: The Intergovernmental Agreement was completed and signed. Illinois EPA is carrying out the required duties.
	Illinois EPA shall submit and implement a formal corrective action plan to USEPA in response to any Technical Systems Audit findings and or/recommendations	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA		2014 Status: USEPA audited Illinois' monitoring program in September 2013. Illinois EPA received final audit findings in June 2014 letter. Illinois EPA submitted its response that addresses audit findings to USEPA in September 2014. 2015 Status: USEPA audited Illinois' monitoring program in September 2013. Illinois EPA received final audit findings in June 2014 letter. Illinois EPA submitted its response that addresses audit findings to USEPA in

	Illinois EPA shall demonstrate compliance with new FEM (Forum on Environmental Measurements) policy http://www.epa.gov/fem/index.htm	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA		September 2014. 2014 Status: The Illinois EPA continues to comply with the FEM as required. 2015 Status: The Illinois EPA continues to comply with the FEM as required.
	Attend the annual Region 5 State/Local/Tribal Air Monitoring Contacts meeting, Participate in the monthly S/L/Tribal monitoring calls. Attend the Triennial National Monitoring conference, the annual AQS conference and the annual QA conference if they are held.	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will attend the annual Region 5 Contacts meeting when held in Illinois. Attendance at all out-of-state conferences will occur only if out-of-state travel is approved on the State level and funding is available.	2014 Status: The Contacts meeting has changed to every other year, and Illinois attended last year when it was held. 2015 Status: Out-of-state travel was not available for this meeting. However, appropriate personnel downloaded and reviewed the slides that were presented.
	Reporting – Illinois EPA and EPA will continue to participate in bi-weekly conference calls between the Illinois EPA Air Monitoring Section Manager (or his or her designee) and EPA AMAS Section Chief (or his or her designee); unless an alternative schedule is agreed to by both parties.	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will participate in conference calls with EPA to discuss updates on training, staffing, and equipment replacement and purchases.	2014 Status: Illinois EPA has been participating in conference calls with USEPA to discuss equipment, staffing, training, and other issues. 2015 Status: Illinois EPA has been participating in (generally) monthly conference calls with USEPA to discuss equipment, staffing, training, and other issues. Both parties agreed that bi-weekly calls were not necessary.
	Equipment Replacement	David Bloomberg or his designee, Illinois EPA Loretta Lehrman, Marta Fuoco, EPA	Illinois EPA will provide regular updates in bi-weekly calls. Illinois will discuss equipment replacement strategy with EPA as needed. EPA recognizes that this is an evergreen document that will be revised from time to time	2014 Status: Ongoing. Illinois EPA continues to discuss equipment replacement on calls as needed and continues to pursue equipment replacement based on availability of funding and need.

			to reflect funding, regulatory changes, and unexpected events; e.g., damage to a monitoring site due to tornado, hail, rain, vandalism, etc.	2015 Status: Ongoing. Illinois EPA continues to discuss equipment replacement on calls as needed and continues to pursue equipment replacement based on availability of funding and need.
Work Plan Outputs/Measures/Outcomes – Attainment Planning and Maintenance				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Review air quality reports and take appropriate actions dealing with new violating attainment areas with any of the NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to review air quality data and will take appropriate actions to address new violating areas.	2014 Status: Ongoing. No new violating areas. 2015 Status: Ongoing. No new violating areas.
	As appropriate, submit redesignation requests including maintenance plans for areas with clean air quality data.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA submitted a Maintenance Plan and redesignation request for the Chicago area for the PM _{2.5} annual standard based on air quality data from 2006-2008. EPA published its final clean data finding which satisfies the obligation to submit an attainment demonstration for Chicago. On August 7, 2013, USEPA published the proposed redesignation in the Federal Register.	2014 Status: Redesignation was effective October 2, 2013. 2015 Status: Ongoing. Illinois EPA is working for redesignation under the 2008 ozone NAAQS has begun.
	Continue to implement 1997 PM _{2.5} and 8-hr ozone SIPs.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement the regulations developed for the PM _{2.5} and 8-hour ozone NAAQS.	2014 Status: Illinois EPA is continuing to implement the regulations developed for the PM _{2.5} and 8-hour ozone NAAQS. 2015 Status: Illinois EPA is continuing to implement the regulations developed for the PM _{2.5}

	Submit any outstanding 1997 PM _{2.5} SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit any outstanding 1997 PM _{2.5} SIP elements as necessary.	and 8-hour ozone NAAQS. 2014 Status: Illinois EPA is evaluating the impact of PM _{2.5} data quality issues and will continue to submit any outstanding 1997 PM _{2.5} SIP elements as necessary and appropriate. 2015 Status: Illinois EPA is evaluating the impact of PM _{2.5} data quality issues and will continue to submit any outstanding 1997 PM _{2.5} SIP elements as necessary and appropriate.
	Prepare recommendations on designations for revised NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations as NAAQS are revised by USEPA.	2014 Status: In December 2013 Illinois EPA sent recommended PM _{2.5} designation to USEPA for consideration. Illinois EPA and USEPA are working together to address PM _{2.5} data quality issues. USEPA's 120-Day letter for PM _{2.5} was sent to Illinois on August 19, 2014, with a recommendation of Unclassifiable for the entire State. 2015 Status: Illinois EPA submitted recommendations for five areas related to the Sierra Club/USEPA lawsuit settlement for SO ₂ , and is now working on additional areas under the Data Requirements Rule.
	Facilitate implementation of NOx and SO2 requirements under Transport Rule, pending court decisions on the Cross State Air Pollution Rule (CSAPR).	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will facilitate implementation of CAIR and any replacement rule, as required and appropriate, by affected sources in Illinois.	2014 Status: Illinois EPA is implementing CAIR and closely following developments with the CAIR replacement rule known as the Cross State Air Pollution Rule (CSAPR). The US Court of Appeals

				<p>ended the stay on CSAPR in a ruling issued October 23, 2014. Several uncertainties regarding CSAPR still exist.</p> <p>2015 Status: On November 16, 2015 USEPA proposed the CSAPR Update Rule for the 2008 ozone NAAQS. Illinois EPA is reviewing the new proposal and continues to implement the existing CSAPR as required and appropriate.</p>
	Submit SIPs for the lead NAAQS.	David Bloomberg, Illinois EPA, Douglas Aburano, Edward Doty, EPA	The Illinois EPA will submit attainment SIPs for areas designated nonattainment for the lead NAAQS. As of July, agreement has been reached with stakeholders & USEPA; regulations will be proposed to the Board shortly as a fast-track rulemaking.	<p>2014 Status: The lead rule was published in the Illinois Register on May 2, 2014. The SIP submittal was made to USEPA on June 17, 2014.</p> <p>2015 Status: The lead rule was published in the Illinois Register on May 2, 2014. The SIP submittal was made to USEPA on June 17, 2014. Illinois EPA awaits USEPA approval of these regulations and the attainment demonstration, but may move toward redesignation for both areas after 2015 data has been certified.</p>
	Consult with EPA, as necessary, to finalize area designations for the NO ₂ primary and SO ₂ primary NAAQS.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will provide timely recommendations on attainment/nonattainment designations for the revised NO ₂ and SO ₂ NAAQS as necessary. The Illinois EPA will continue to work with EPA to finalize the area designations.	<p>2014 Status: Ongoing.</p> <p>2015 Status: Illinois EPA submitted recommendations for five areas related to the Sierra Club/USEPA lawsuit settlement for SO₂, and is now working on additional areas under the Data Requirements Rule.</p>
	Conduct public notifications and education efforts,	Deirdre McQuillen, Illinois EPA	The Illinois EPA maintains the air quality notification system,	2014 Status: Ongoing.

	including reporting air quality forecasts and current conditions for ozone and particle pollution.	Michael Compher, EPA	EnviroFlash, for six regions in Illinois, providing daily air quality forecasts and air quality alerts. The Agency, in conjunction with Illinois Partners for Clean Air has been increasing enrollment in the notification system since 2009 with more than 6,500 current subscribers. Public education and outreach continues to expand with a year-round media campaign targeting on-road vehicles and energy efficiency. The campaign includes various media (radio, television, outdoor, digital and online) which continues in State Fiscal Year 2015. The Illinois EPA and Illinois Partners for Clean Air continue to encourage residents, businesses and government entities to sign up for air quality forecasts through EPA's EnviroFlash program online and through outreach events.	<p>2015 Status: Illinois EPA has increased EnviroFlash subscribers to 7,400, and placed first in the Total Subscriber Increase in the 2015 AirNow EnviroFlash Challenge.</p> <p>In 2015 the Safe at Home Contest was launched as a promotional and educational effort aimed at citizens. Illinois EPA had 23,000 people visit the contest website, 3,200 enter the contest, and over 1,000 people answered all three air quality questions correctly. 68% of people said they learned about air quality from the quiz, including those who learned so much as to change their behavior.</p>
	Assist with outreach and capacity building for minority, low-income and indigenous communities to improve understanding of and engagement in regulatory and permitting processes.	Brad Frost, Illinois EPA Lara Lasky, EPA	Utilize the Illinois EPA Environmental Justice Policy. Notify the Environmental Justice Officer of projects in Environmental Justice areas. Participate in the Illinois EPA Environmental Justice Advisory Group. Work cooperatively with USEPA on EJ issues. Meet all requirements associated with the Geneva Settlement, Administrative Complaint 13R-10-R5.	<p>2014 Status: Ongoing. Illinois EPA submitted final report to USEPA in regard to Geneva Settlement in May 2014. USEPA reviewed the final report and sent letter to Illinois EPA dated July 2, 2014, indicating satisfactory completion of requirements.</p> <p>2015 Status: Ongoing. Illinois EPA continues to implement its EJ Policy and Public Participation Policy.</p>

	Develop and submit SIP revisions, if desired, to remove active Stage II gasoline vapor recovery programs	Darwin Burkhart, Illinois EPA, Pamela Blakley, Frank Acevedo EPA		<p>2014 Status: Stage II SIP revision to stop the implementation of new Stage II installations and establish decommissioning requirements were sent to Region 5 in January 2014. USEPA issued a proposed approval of this SIP revision but has received adverse comments and will likely withdraw the approval and develop a response to the comments.</p> <p>2015 Status: Objective completed.</p>
	Implement mobile source control strategies (such as I/M programs and transportation control measures) on time and consistent with SIP commitments.	Chris Demeroukas, Darwin Burkhart, Illinois EPA Pamela Blakley, Frank Acevedo EPA		<p>2014 Status: Ongoing. Specifically, the I/M program is continuing to be operated and transportation control measures are continuing to be evaluated in accordance with SIP requirements.</p> <p>2015 Status: Ongoing.</p>
	Prepare and submit data for the 2014 National Emissions Inventory.	David Asselmeier or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will submit data for the 2014 National Emissions Inventory by December 2015.	<p>2014 Status: No action as of yet. The inventory is not due until December 2015. The bulk of the work will take place in calendar year 2015.</p> <p>2015 Status: As of December 3, 2015, the point, nonpoint, and on road mobile source inventories have been submitted. The remaining items to be submitted are aircraft and off road. Illinois EPA and USEPA are working together to come to one common reporting structure for aircraft. This is almost accomplished and emissions will be reported by December 31st. Illinois EPA</p>

				performed off road emission calculations using MOVES. At this time, USEPA is still working on a reporting format for that data. Off-road data is also expected to be submitted by December 31 st .
	Develop attainment demonstrations for SIPs for SO2 nonattainment areas and conduct other SO2 air quality planning in accordance with EPA rules and guidance.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will develop attainment demonstrations and conduct other SO2 air quality planning in accordance with EPA rules and guidance, when such rules and guidance are finalized.	<p>2014 Status: Modeling for the nonattainment areas was completed in June 2014. Rules are currently being drafted. An outreach meeting with representatives of affected sources and environmental groups was held on August 14, 2014.</p> <p>2015 Status: SO2 rules have been approved by the Illinois Pollution Control Board. The attainment demonstration will be submitted to USEPA after the required public hearing, set for December 16.</p>
Work Plan Outputs/Measures/Outcomes – Regional Haze – Attainment Planning and Maintenance				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Implement BART requirements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will continue to implement BART emission limits through federally enforceable permits and its MPS/CPS rules	<p>2014 Status: Ongoing.</p> <p>2015 Status: Ongoing.</p>
	Submit any outstanding Regional Haze SIP elements.	David Bloomberg, Illinois EPA Douglas Aburano, Edward Doty, EPA	The Illinois EPA will work with LADCO and other Midwestern states to prepare and submit a mid-course review of the progress goals established in the Regional Haze SIP.	<p>2014 Status: Ongoing. No submittals are required or pending at this time.</p> <p>2015 Status: Ongoing. No submittals are required or pending at this time.</p>
Work Plan Outputs/Measures/Outcomes – Permitting				

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Provide timely review of construction permits issued compliant with Greenhouse Gas BACT.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	PSD/NSR Permitting: Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, will notify EPA of any GHG BACT applications during the monthly conference calls, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit.	<p>2014 Status: Illinois EPA issued one PSD permit in December 2013 to Hoosier Energy, however, Hoosier was not subject to BACT for GHG because of USEPA's waiver for biogenic CO₂. There were no NSR permits for GHGs issued in FFY14. USEPA was notified of any GHG BACT applications during the monthly calls and copies of the permit applications were provided.</p> <p>2015 Status: Illinois EPA took six PSD actions, issuing a PSD permit to Cronus Chemicals*, Mississippi Lime, and revised PSD permits to Ingredion, Dynegy Kendall Energy and Phillips 66 (two revised permits, both for the CORE project). The permit for Cronus, Mississippi Lime and one of the revised permits for Phillips 66 included determinations of BACT for GHG. USEPA was notified of the GHG BACT applications during the monthly calls and copies of the permit applications were provided. Both of the revised PSD permits issued to Phillips 66 also involved NSR.</p> <p>*The PSD permit for Cronus Chemicals was issued in FY 2014 but did not become effective until FY</p>

	Target issuance of major PSD/NSR permits within one year of receiving a complete permit application.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will continue to issue construction permits and PSD and NSR permits as expeditiously as practicable. The Illinois EPA will process new applications (received after October 15, 2012) for PSD permits recognizing applicable EPA guidance on timely processing of PSD permits.	2015. 2014 Status: Once an application for a PSD permit is complete, the Illinois EPA strives to process the application within one year. It should be understood that applications for PSD permits are rarely complete when initially submitted. Given resource constraints, priority is given to applications for PSD permits for new projects rather than revisions to issued PSD permits. Status of the processing of PSD applications, including timeliness, is routinely discussed with USEPA during the monthly NSR call. 2015 Status: Once an application for a PSD permit is complete, the Illinois EPA strives to process the application within one year. It should be understood that applications for PSD permits are rarely complete when initially submitted. Given resource constraints, priority is generally given to applications for PSD permits for new projects rather than revisions to issued PSD permits. Status of the processing of PSD applications, including timeliness, is routinely discussed with USEPA during the monthly NSR call.
	Issue NSR permits consistent with CAA requirements and enter BACT/LAER	Permit Section Manager or his designee, Illinois EPA	The Illinois EPA will continue to timely submit data to the RACT/BACT/LAER Clearinghouse.	2014 Status: All BACT/LAER determinations were timely submitted to the RACT/BACT/LAER

	determinations in the RACT/BACT/LAER Clearinghouse (RBLC).	Genevieve Damico, EPA		<p>Clearinghouse following the effectiveness of the PSD or NA NSR permit.</p> <p>2015 Status: All BACT/LAER determinations were timely submitted to the RACT/BACT/LAER Clearinghouse following the effectiveness of the PSD or NA NSR permit.</p>
	Provide timeliness data on NSR permits issued for new major sources and major modifications by entering data including “the application accepted date” and “the permit issuance date” into the RBLC national database.	<p>Permit Section Manager or his designee, Illinois EPA</p> <p>Genevieve Damico, EPA</p>	The Illinois EPA will provide timeliness data.	<p>2014 Status: Illinois EPA has updated the RBLC national database during this reporting period.</p> <p>2015 Status: Illinois EPA updated the RBLC national database during this reporting period.</p>
	PSD-delegated states coordinate with EPA to ensure that Endangered Species Act consultations are handled in a timely manner.	<p>Assigned permit engineers, Illinois EPA</p> <p>Genevieve Damico, EPA</p>	<p>As related to consultation under the federal Endangered Species Act (ESA), consultation with the USFWS for the planned issuance of permits for proposed projects will be performed by EPA, working directly with applicants for proposed projects. The Illinois EPA will instruct applicants to directly contact EPA to initiate EPA’s ESA review and consultation. The Illinois EPA and EPA will attempt to coordinate their respective roles in permitting so that ESA consultation is handled in an efficient and timely manner and that the ESA consultation process does not unduly delay the issuance of PSD</p>	<p>2014 Status: Progress on Endangered Species Act consultations is discussed with USEPA during monthly calls.</p> <p>2015 Status: Progress on Endangered Species Act consultations was discussed with USEPA during monthly calls.</p>

	Provide PSD/NSR permit applications to EPA prior to the start of the public comment period.	Assigned permit engineers, Illinois EPA Genevieve Damico, EPA	permits. The Illinois EPA will process construction permit applications, including PSD and New Source Review applications, as appropriate, and will provide EPA with an electronic copy of the permit application on or before the date the public comment period begins on a draft permit. The Illinois EPA and EPA will continue to hold monthly permit program calls and New Source Review permit calls for issue resolution and information sharing.	2014 Status: Illinois EPA issued one PSD permit in December 2013 to Hoosier Energy, however, Hoosier was not subject to BACT for GHG because of USEPA's waiver for biogenic CO ₂ . Copies of any permit applications for PSD/NSR construction permits were provided to EPA prior to the public comment period. Illinois EPA participated in monthly conference calls with EPA during this period. 2015 Status: Copies of any permit applications for PSD/NSR construction permits were provided to USEPA prior to the public comment period. Illinois EPA participated in monthly conference calls with USEPA during this period. Illinois EPA took six PSD permit actions.
	Provide PSD application tracking data to EPA on a quarterly basis.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	The Illinois EPA will provide to EPA quarterly updates on agreed to fields for PSD application tracking data being maintained by EPA, including information on each permit milestone and permit issuance.	2014 Status: PSD application tracking data was provided to USEPA on a quarterly basis. 2015 Status: PSD application tracking data was provided to USEPA on a quarterly basis.
USEPA Strategic Goal: 1 – Taking Action on Climate Change & Improving Air Quality				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.				
USEPA 2011-2015 Strategic Outcomes – Reduce Criteria Pollutants and Regional Haze				
Work Plan Outputs/Measures/Outcomes – Air Toxics				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement	Performance Partnership Grant Status/Progress

			Planned Activities or Commitments	
	Emission Inventory: (1) Develop HAP emission inventories for submission to EPA's National Emissions Inventory (NEI) database; (2) submit data for the integrated HAP emissions inventory; (3) Quality assure, validate, and revise NEI data using EIS; and (4) Participate in Regional emission inventory workgroup conference calls.	David Asselmeier or his designee, Illinois EPA Carlton Nash, Suzanne King, EPA	The Illinois EPA will continue to provide appropriate and accurate data and work together with EPA to review and ensure the quality of data.	2014 Status: HAP emissions for point and non-point sources are planned to be submitted for the 2014 inventory. Illinois EPA responds to requests/questions from USEPA when an issue is raised and appropriate corrections are made. 2015 Status: As of December 3, 2015, HAP emissions for the point and nonpoint inventory categories have been submitted. Illinois EPA continues to respond to requests/questions from USEPA when an issue is raised.
	Implement delegated Section 112 of the Clean Air Act, as appropriate.	David Bloomberg, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA continues to be an active participant in the implementation of standards under Section 112 of the Clean Air Act (e.g., MACT, area source NESHAPs). Illinois EPA has delegated authority for implementation of these regulations. Illinois EPA will continue to provide outreach, education, and other assistance to affected sources primarily through the Small Business Environmental Assistance Program.	2014 Status: Participation and outreach continues with assistance from the Small Business Environmental Assistance Program. 2015 Status: Participation and outreach continues with assistance from the Small Business Environmental Assistance Program.
	Participate in the quarterly State/Region 5 risk assessment conference calls. Participate in annual State/Region 5 air toxics meeting.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in quarterly Region 5 conference calls and annual air toxics meetings as appropriate.	2014 Status: Ongoing. 2015 Status: Ongoing.

	Review and analyze NATA data, as available. Region 5 will provide timely access to and assistance to the review of the NATA data.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA will continue to participate in the review process for NATA.	<p>2014 Status: Illinois EPA reviewed the NATA data and made updates as necessary.</p> <p>2015 Status: Illinois EPA reviewed the NATA data and made updates as necessary.</p>
	Participate as appropriate in research projects, policy issues and task forces that address identification and reduction of persistent bio-accumulative air toxic pollutants.	Jeff Sprague, Illinois EPA Carlton Nash, Suzanne King, EPA	Illinois EPA remains open to discussions involving its participation in a Regional Air Toxics Priority Project and/or addressing High Risk Point Sources as identified through NATA. Illinois may participate to the extent appropriate, in consideration of available resources, through emissions verification, data review and site visits.	<p>2014 Status: Ongoing.</p> <p>2015 Status: Ongoing.</p>
	Great Lakes Air Deposition Program: Address the deposition of persistent bio-accumulative toxics (PBTs) in the waterways of the Great Lakes Region. This effort includes, but is not limited to, PBT air monitoring, source characterization, source allocation, and source reduction efforts.	Kevin Greene, Illinois EPA Erin Newman, EPA	<p>Ongoing through September 30, 2016</p> <ol style="list-style-type: none"> 1) In FFY 2014 Illinois provided \$30,000 to LADCO for mercury monitoring. LADCO has reported on this work directly to USEPA. Illinois will not provide any GLAD funding to LADCO in FFY 2015 as funds will be used for Illinois work in this area. 2) Develop and implement strategies to realize mercury reductions. 3) Implement Illinois mercury reduction rule (35 Ill. Ad. Code Part 225 – requires 90% 	<p>2014 Status: Previous commitment by Illinois EPA was to work to identify monitoring network needs and to address this program. Plans were underway to advance a procurement package to upgrade Illinois' monitoring network. These efforts are ongoing, however, it has been determined that the work now identified is more reflective of GLAD funding intent and the monitoring work is no longer addressed here.</p> <ol style="list-style-type: none"> 1) Illinois provided \$30,000 to LADCO for mercury monitoring. LADCO has reported on this work directly to USEPA. 2) Illinois EPA developed and did initial outreach on a rulemaking to

			<p>reduction in mercury from coal-fired power plants) to reduce mercury deposition in Great Lakes Region as well as other Illinois and regional waterbodies.</p> <p>4) Continued development and implementation of Mercury Products Stewardship Program. Illinois EPA continues work on a major initiative to ensure that mercury-containing components found in consumer and commercial products are properly managed at the end of their useful life. If thrown in the trash, products containing mercury may be crushed or broken during collection or disposal activities, causing the mercury to be released into the air.</p> <p>5) Participate in Great Lakes Regional Collaboration for regional mercury reduction strategies.</p> <p>6) Continue to work with Johnson Controls Battery Group Inc. on operation of lead monitor in Greater Chicago area.</p> <p>7) Between July 3, 2013, and February 10, 2014, Illinois EPA will collect air monitoring samples at two monitors near O'Hare airport. This was done</p>	<p>set annual collection goals for the mercury thermostat collection program for calendar years 2015-2020. Further, Illinois EPA developed a work plan for a pilot project to evaluate the feasibility of collecting mercury thermostats from homeowners and small contractors at retail hardware stores. Also, Illinois EPA conducted 30 site visits at HVAC equipment wholesalers to educate them on collection responsibilities regarding mercury thermostats. Moreover, Illinois EPA worked with the Thermostat Recycling Corporation to update their education and outreach programs for promoting mercury thermostat recycling.</p> <p>3) Illinois EPA continued to implement the Illinois mercury rule. Implementation efforts included periodic stack test, CEMS, and sorbent trap data review and data compilation. Additionally, review of annual compliance reports is conducted each year.</p> <p>4) Efforts on this program continued as several staff work on. See: http://www.epa.illinois.gov/topics/pollution-prevention/mercury/index.</p> <p>5) Illinois EPA continued to participate in the Great Lakes Regional Collaboration group,</p>
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			<p>in cooperation with the Chicago Department of Aviation. Each monitor measured 93 different compounds, including U.S. EPA-designated Urban Air Toxics and other HAPs emitted by mobile sources. These include polycyclic aromatic hydrocarbons (PAH). This monitoring was conducted as part of an environmental analysis of the O'Hare Modernization Program (OMP).</p> <p>FFY2015 All the above work and projects are ongoing in FFY 2015 as these programs require ongoing implementation and support work. For example, FFY 2015 work on the Mercury Product Stewardship Program will include: <u>Mercury-Switch Thermostats</u></p> <ul style="list-style-type: none"> • Conducting compliance outreach to heating, ventilation and cooling equipment wholesalers and large contractors that serve as collection sites for out-of-service mercury thermostats, • Conducting a pilot project that provides mercury thermostat collection services to homeowners and small HVAC 	<p>which seeks regional mercury emission reductions.</p> <p>6) Illinois EPA continued to collect and analyze lead data from this monitor.</p> <p>7) Illinois EPA collected air monitoring samples between July 3, 2013, and February 10, 2014 near O'Hare airport. Work is ongoing as Illinois EPA is assisting CBA in preparation of a final report of the monitoring project. Further, The Illinois EPA was notified in 2015 that the FAA believes further air quality analysis is warranted in this area.</p> <p>2015 Status: Illinois EPA continued to implement its Mercury Products Stewardship Initiative. These efforts included:</p> <ol style="list-style-type: none"> 1) Continued oversight of the thermostat industry-sponsored program for recycling mercury thermostats that are taken out of service from residential and commercial buildings in the state. As of November 23, this program collected approximately 11,500 mercury thermostats in 2015. 2) Recruitment of 37 retail hardware stores to participate in a pilot project for collecting out-of-service mercury thermostats from homeowners and small HVAC contractors. 3) Promotion of the industry
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			<p>contractors through retail hardware stores,</p> <ul style="list-style-type: none"> • Collecting data on mercury thermostat disposal activities by HVAC contractors across the state, • Promoting the mercury switch collection program to utility energy efficiency contractors that replace mercury thermostats with programmable thermostats in residential and commercial buildings. <p><u>Mercury Auto Switches</u></p> <ul style="list-style-type: none"> • Conducting compliance outreach to vehicle recyclers to educate them about the important and legal responsibilities of removing mercury switches from older vehicles, • Publishing educational articles in industry trade publication on the status of the program and need for continued recycling efforts, • Reviewing annual mercury collection reports submitted by vehicle recyclers. <p><u>Mercury Switches and Relays</u></p> <ul style="list-style-type: none"> • Conduct reviews of petitions for exemptions from the state law that prohibits the sale of commercial and consumer products that contain mercury 	<p>thermostat recycling program to electric and natural gas utilities that administer rebate programs for programmable thermostats in the state.</p> <p>4) Continued compliance assistance to wholesale HVAC equipment distributors that serve as collection sites for out-of-service mercury thermostats.</p> <p>5) Review of annual mercury switch collection reports submitted by over 250 vehicle recyclers.</p> <p>6) Review of five petitions seeking an exemption from the state law that prohibits the sale of consumer and commercial products containing mercury switches and relays.</p> <p>7) In collaboration with other states, research non-mercury alternatives for mercury-filled pressure transducers.</p>
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			switches or relays. • Conducting research on mercury-free alternatives, coordinating reviews with other state programs.	
USPEA Strategic Goal: Enforcing Environmental Laws				
USEPA Strategic Objective 5.1: Enforcement Environmental Laws. Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide.				
Work Plan Outputs/Measures/Outcomes – Monitoring				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit draft Compliance Monitoring Strategy (CMS) plan for review, negotiation and approval by EPA. (September 1, 2013) Implementation of the final CMS plan will begin the upcoming federal fiscal year, as it pertains to non-Title V sources. The CMS plan should meet EPA's September 10, 2010 CAA Stationary Source CMS policy. (October 1, 2013).	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, Joseph Koester, EPA	The Illinois EPA will continue to submit the Illinois CMS plan to EPA and implement it as approved by EPA. The CMS source category and frequency flags in AFS will be completed for non-Title V major source universe by the state by October 15, 2013. EPA shall submit written correspondence to Illinois EPA approving or disapproving the CMS plan. (January 1, 2014)	2014 Status: Illinois EPA submitted the draft CMS plan to USEPA on August 26, 2013. The draft CMS plan met USEPA's September 10, 2012 CAA Stationary Source CMS Policy. The Illinois EPA completed the CMS source category and frequency flags in AFS on September 27, 2013. USEPA approved the CMS plan on November 19, 2013. The Illinois EPA completed all inspections of CMS sources in accordance with the plan by September 30, 2014. 2015 Status: Illinois EPA submitted the draft CMS plan to USEPA on August 27, 2014. The draft CMS plan met USEPA's July 14, 2014 CAA Stationary Source CMS Policy. The Illinois EPA completed the CMS source category and frequency flags in AFS on September 29, 2014. The CMS plan was approved by USEPA on February 10, 2015. The Illinois EPA completed all inspections of CMS

				sources in accordance with the plan by September 30, 2015.
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Sources/landfills subject to the asbestos NESHAP regulations will be inspected in accordance with EPA's March 31, 1988 Revised Asbestos NESHAP Strategy. (Ongoing)	Ron Robeen or his designee, Illinois EPA Nathan Frank, EPA	The Illinois EPA will continue to inspect sources/landfills in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy.	<p>2014 Status: The Illinois EPA inspected sources/landfills in accordance with EPA's March 31, 1988, Revised Asbestos NESHAP Strategy.</p> <p>2015 Status: The Illinois EPA inspected sources/landfills in accordance with USEPA's March 31, 1988, Revised Asbestos NESHAP Strategy.</p>
Track State Review Framework recommendations made by EPA to the states until completion and provide updates to USEPA, as it pertains to non-Title V sources. (Quarterly)	Eric Jones or James Morgan, Illinois EPA Nathan Frank, Rochelle Marceillars, EPA	The Illinois EPA will continue to track EPA's SRF recommendations until completion.	<p>2014 Status: Illinois EPA continues to track and implement SRF recommendations through discussion on monthly calls and the SRF tracker through the ECHO database. Awaiting SRF recommendation base on the Round 3 SRF Audit completed in May 2014.</p> <p>2015 Status: Illinois EPA continues to track and implement SRF recommendations through discussion on bi-monthly calls and the SRF tracker through the ECHO database. In addition, the Illinois EPA has been implementing revisions to our internal policies based on the deficiencies and recommendations identified in the draft SRF Audit Report dated February 11, 2011.</p>

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	Respond to citizen complaints including those referred from EPA.	Ron Robeen or his designee, Illinois EPA, Nathan Frank, EPA	The Illinois EPA will continue to respond to citizen complaints and inspections will be conducted where necessary.	<p>2014 Status: The Illinois EPA responded to citizen complaints referred from EPA and inspections were conducted where necessary. Some complaints and inspections were performed by the City of Chicago and Cook County per Intergovernmental Agreements.</p> <p>2015 Status: The Illinois EPA responded to citizen complaints referred from USEPA and inspections were conducted where necessary. Some complaints and inspections were performed by the City of Chicago and Cook County per Intergovernmental Agreements.</p>
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Work Plan Outputs/Measures/Outcomes – Enforcement – Reporting

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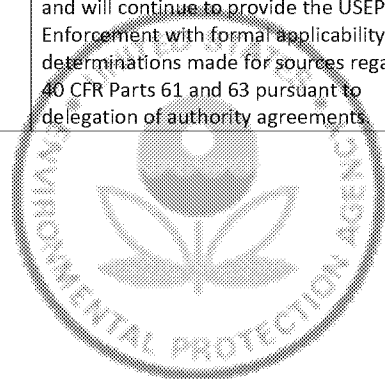
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Submit compliance and enforcement information to meet EPA's Minimum Data Requirements (MDRs) within the 60 day standard required for reporting by the current Air Facility System (AFS) Information Collection Request (ICR). Ensure data is complete, accurate and timely consistent with EPA policies and ICR, as it pertains to non-Title V sources. Such language should be included in the written agreement between the State and EPA. (60 day reporting as required by ICR)	Eric Jones or James Morgan, Illinois EPA Rochelle Marceillars, Joseph Koesters, EPA	The Illinois EPA will submit MDRs in accordance with the current AFS ICR.	<p>2014 Status: The Illinois EPA submitted MDRs at the beginning of each month which met the 60 day standard required for reporting the current AFS ICR. The data submitted to AFS is reviewed by Illinois EPA immediately after each monthly upload and further reviewed during monthly EPA/Illinois EPA Compliance, Enforcement and Data Management and Reporting Conference Calls to ensure data is complete, accurate and timely consistent with EPA policies and ICR.</p> <p>2015 Status: The Illinois EPA continues to submit MDRs at the beginning of each month. The data submitted to ICIS is reviewed by Illinois EPA immediately after each monthly upload and further reviewed during bi-monthly USEPA/Illinois EPA Compliance, Enforcement and Data Management and Reporting conference calls to ensure data is complete, accurate, and timely consistent with USEPA policies.</p>
	Asbestos notification information, compliance evaluations and enforcement activities will be reported alphabetically by owner or operator to the EPA by the State. (Annually)	Ron Robeen or his designee, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will report the number of Asbestos notifications received and will provide EPA with the number of inspections performed and enforcement actions taken, including penalties assessed.	<p>2014 Status: The Illinois EPA submitted an asbestos program annual report to EPA on October 22, 2014.</p> <p>2015 Status: The Illinois EPA submitted an asbestos program annual report to USEPA on October 19, 2015.</p>
Work Plan Outputs/Measures/Outcomes – Enforcement				
Grant	Template Measures	Contacts	Performance Partnership Agreement	Performance Partnership Grant

Code			Planned Accomplishments	Status/Progress
	Compliance and Enforcement Activities	Eric Jones or James Morgan, Illinois EPA Nathan Frank, , Rochelle Marceillars, Daneshia Hamilton EPA	EPA and Illinois EPA will conduct monthly conference calls to discuss planning, program progress, compliance and enforcement issues, federal and state HPV cases, data management and reporting, and efforts to resolve violations, as it pertains to non-Title V sources. For state lead HPV cases unaddressed over the 270 day timeframe, EPA will provide notice to Illinois EPA of EPA's intent to take or maintain the lead for the case and will discuss the status of the state case with the Illinois EPA. Any data issues will also be discussed on the conference calls. (Monthly)	<p>2014 Status: On the first Tuesday of every month, USEPA and Illinois EPA conduct a Compliance, Enforcement and Data Management and Reporting conference call to discuss planning, program progress, compliance and enforcement issues, Federal and State HPV cases, data management and reporting, and efforts to resolve violations. For State lead HPV cases unaddressed over the 270 day timeframe, USEPA provided notice to Illinois EPA of USEPA's intent to take or maintain the lead for the case and discussed the status of the state case with the Illinois EPA. Data issues were also discussed on the conference.</p> <p>2015 Status: On the first Tuesday of every other month, USEPA and Illinois EPA continue to conduct a Compliance, Enforcement and Data Management and Reporting conference call to discuss planning, program progress, compliance and enforcement issues, Federal and State HPV cases, data management and reporting, and efforts to resolve violations.</p>
	HPV sources listed on Headquarters Watch List, as it pertains to non-Title V sources - the Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQs OECA, Region 5 EPA	Eric Jones, Illinois EPA Rochelle Marceillars, EPA	The Illinois EPA will continue to provide to EPA the status codes and explanations for the HPV sources listed on Headquarters' Watch List as it pertains to Non-Title V sources.	<p>2014 Status: The Illinois EPA provided USEPA the status codes and explanations for the HPV sources during monthly calls with the USEPA and MDR data submitted to the USEPA.</p> <p>2015 Status: The Illinois EPA continues to provide USEPA the status codes and explanations for the HPV sources during bi-monthly calls with the USEPA and MDR data submitted to the USEPA.</p>

	and/or Illinois EPA. (Quarterly)			
	State will conduct its enforcement activities in accordance with the December 22, 1998, EPA Timely and Appropriate Enforcement Response to High Priority Violations (HPVs) policy, October 25, 1991, Clean Air Act Stationary Source Civil Penalty policy and March 31, 1988, Revised Asbestos NESHAP Strategy, as it pertains to non-Title V sources. (Ongoing)	Eric Jones or James Morgan, Illinois EPA Nathan Frank, EPA	The Illinois EPA will continue to conduct enforcement activities in accordance with the policies identified in the Template Measures.	<p>2014 Status: During this reporting period the Illinois EPA conducted enforcement activities in accordance with the policies identified in the Template Measures.</p> <p>2015 Status: The Illinois EPA continues to conduct enforcement activities in accordance with identified USEPA policies.</p> <p>EPA Response: The Air Enforcement program concurs with IEPA's assessment of progress on the activities conducted. However, there are two template measures that should have been removed:</p> <p><u>Template Measures Removed</u> HPV sources listed on Headquarters Watch List, as it pertains to non-Title V sources. The Watch List ensures timely and appropriate response to significant non-compliers or longstanding violators through better data analysis and routine discussions between EPA HQs, OECA, Region 5 EPA and/or IEPA (Quarterly).</p> <p>Where it has delegation, the State will copy Region 5 Air Enforcement on all Part 61 or Part 63 applicability determinations that it issues at the time of issuance.</p>

	Where it has delegation, the State will copy Region 5 Air Enforcement on all Part 61 or Part 63 applicability determinations that it issues at the time of issuance.	James Morgan, Illinois EPA, Nathan Frank, EPA		<p>2014 Status: Ongoing. The Illinois EPA has and will continue to provide the USEPA Air Enforcement with formal applicability determinations made for sources regarding 40 CFR Parts 61 and 63 pursuant to delegation of authority agreements.</p> <p>2015 Status: Ongoing. The Illinois EPA has and will continue to provide the USEPA Air Enforcement with formal applicability determinations made for sources regarding 40 CFR Parts 61 and 63 pursuant to delegation of authority agreements.</p>
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APPENDIX A

Title V

Title V activities are not part of the State Air Pollution Control Program funded with EPA Clean Air Act funding.

USEPA Strategic Goal: 1 Clean Air & Global Climate Change				
USEPA Strategic Objective 1.2: Improve Air Quality. Achieve and maintain health-based air pollution standards and reduce risk from toxic air pollutants.				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities or Commitments	Performance Partnership Grant Status/Progress
	Target of the issuance of significant power plant and refinery Title V permits.	Permit Section Manager or his designee, Illinois EPA Genevieve Damico, EPA	Recognizing that the Work Plan commitments have the highest priority and the limitations on processing the Title V power plant permits that are under appeal, to the extent practicable, the Illinois EPA will then prioritize the issuance of significant power plant and refinery Title V permits.	<p>2014 Status: Illinois EPA recognizes that the power plants have a high priority and has dedicated considerable resources over the years in efforts to issue these permits. Illinois EPA continues to work closely with USEPA in resolving outstanding issues surrounding these permits. Coffeen and CWLP's initial Title V permits were issued 10/17/2013 and 10/18/2013, respectively. Kincaid Station went to Public Notice on 6/30/2014. CWLP's re-opened Title V is expected to go to public notice during FFY14.</p> <p>2015 Status: Illinois EPA recognizes the significance of its utility plants and has dedicated considerable resources over the recent two years in an effort to issue effective CAAPP permits to these sources. With the progress to date and ongoing refinements to its process, Illinois is on track to have issued initial and reopener CAAPP permits to the thirteen utility plants in 2016. In an effort to reduce processing time for any one source, BOA has modified the process for these utility permits going forward such that the significant modification will not undergo public notice or USEPA notice separately, but rather will undergo such notice concurrent with the</p>

				<p>reopener permit. This consolidation will save a minimum of 75 days per permit action. In addition, BOA management will provide to George Czerniak, progress updates for the thirteen utilities on a monthly basis beginning with the close of January 2016.</p> <p>EPA Response: Elimination of the Title V backlog continues to be EPA's regional priority. IEPA continued to exceed the Title V backlog reduction milestones for 2015 as set forth in the 2014 permitting workplan. We are committed to working with IEPA to meet its 2016 permit backlog reduction goals.</p> <p>EPA remains concerned with IEPA's progress in issuing Title V permits for coal-fired utilities over the past year. IEPA is significantly behind the schedule agreed to in the 2014 permitting work plan for issuing Title V permits for coal-fired utilities. This ongoing lack of progress means that all of the coal-fired utilities in Illinois continue to operate without up-to-date permits that are protective of public health and environment. EPA notes, however, that IEPA has made changes to its permit issuance procedures that are intended to facilitate the issuance of effective up-to-date utility permits.</p>
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Strategic Goal 2: Protecting America's Waters
Strategic Objective 2.1: Protect Human Health

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Work Plan Outputs/Measures/Outcomes – Carbon Sequestration				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
Environmental Justice	Screen all incoming permit actions/applications for potential Environmental Justice	Ken Page, Illinois EPA	In accordance with the Environmental Justice (EJ) Public Participation Procedure report all proposed permitting actions for facilities located in a potential EJ area as determined by Illinois EPA's screening tool to the EJ Officer for further research.	<p>2014 Status: All applications are being screened. EJ continues to be a high priority for the Illinois EPA.</p> <p>2015 Status: All proposed permitting actions in the Bureau of Land, Bureau of Air and Bureau of Water continue to be screened for potential Environmental Justice using the EJSTART, the Illinois EPA's EJ screening tool.</p>

Attachment B: Bureau of Land

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
Strategic Goal 3: Cleaning up Communities & Advancing Sustainable Development				
Strategic Objective 3.1: Preserve Land				
Work Plan Outputs/Measures/Outcomes – Hazardous Waste Management				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
CFDA 66.801		Gary Victorine-EPA		
	Number of hazardous waste facilities with new or updated controls.	Rob Watson	<p>USEPA: % of hazardous waste management treatment, storage, and disposal facilities with controls in place</p> <p>Illinois EPA: Currently, the % of hazardous waste management treatment and disposal facilities with controls in place is 100%. The % of hazardous waste management treatment, storage, and disposal facilities with controls in place will be updated, as needed.</p>	<p>2014 Status: 100% Complete</p> <p>2015 Status: 100% Complete</p>
		Rob Watson	<p>USEPA: Review and reissue RCRA Part B operating permits in response to renewal applications.</p> <p>Illinois EPA: Anticipate public noticing the draft permit for Detrex (ILD074424938) in October 2013.</p> <p>Anticipate issuing final permits for 3 sites in FFY14:</p> <p>Honeywell (ILD006278170) Safety-Kleen (Elgin) (ILD000805911) Detrex (ILD074424938)</p>	<p>2014 Status:</p> <p>Detrex (ILD074424938): Draft renewal permit issued for public notice on 10/25/2013. Final renewal permit issued on 2/10/2014.</p> <p>Safety-Kleen (Elgin) (ILD000805911) Final renewal permit issued on 3/26/2014.</p> <p>Honeywell Metropolis (ILD006278170) Final renewed permit issued on 10/29/2013.</p> <p>2015 Status:</p>

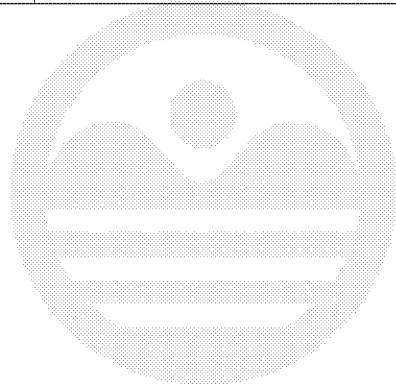
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			<p>Anticipate public noticing the draft RCRA permits for 3 facilities in FFY2015: Century Env. Resources (ILD099215303) – Jan 2015 Clean Harbors Recycling Chicago (ILD005450697) – April 2015 Envirite of Illinois (ILD000666206) – May 2015</p>	<p>Century Env. Resources (ILD099215303) Application received: 11/3/2014 Final Denial Issued: 5/12/2015 No Appeal</p> <p>Clean Harbors Recycling Chicago (ILD005450697) Application received: 10/10/2014 Draft renewal permit issued for public notice on 8/19/2015. (Final Permit issued 12/1/2015; FFY 2016)</p> <p>Envirite of Illinois (ILD000666206) Application received: 2/5/2015 NOI sent 3/30/2015 NOI response received 4/17/2015 (NOD sent 11/3/15; FFY 2016) (NOD response due 1/31/16 FFY 2016) Scheduled public notice for draft decision: 6/5/2016</p>
	Amount of hazardous waste managed at commercial treatment/disposal facilities annually	Hope Wright	Report tons of hazardous waste managed at commercial treatment/disposal facilities	<p>2014 Status: 394,464.6 tons of hazardous waste were managed at commercial TSD facilities in CY 2013.</p> <p>2015 Status: In 2014, 186,928 tons of hazardous waste were managed for recovery/reuse at commercial TSD facilities. Illinois' hazardous waste landfills are now full.</p>
	% of Resource Conservation and Recovery Act (RCRA) regulated & inspected sites will be in full compliance, under an accepted compliance commitment agreement, or referred for formal enforcement within 180 days of inspection date	Brian White	Report Significant Non-Compliers (SNC) rate within compliance monitoring program.	<p>2014 Status: BOL identified 12 SNCs in FFY2014.</p> <p>2015 Status: BOL identified 5 SNCs in FFY2015.</p>
		Greg	Assess and report environmental benefits	2014 Status: No enforcement cases in FFY 2014

		Richardson	that are achieved due to resolution of enforcement cases that involve P2, SEPs, etc.	included SEPs or P2 provisions. 2015 Status: No enforcement cases in FFY 2015 included SEPs or P2 provisions.
	Ensure proper closure and post-closure of all inactive hazardous waste landfills	Rob Watson	Report % of Government Performance Results Act (GPRA) Baseline Post-Closure Universe facilities brought under control. Illinois EPA: Currently 99% (55 of 56) of GPRA Baseline Post-Closure Universe facilities have been brought under control. Illinois EPA will continue to work toward bringing 100% (56 of 56) of GPRA Baseline Post-Closure Universe facilities under control.	2014 Status: On 3/21/2014, Keystone Steel & Wire (ILD000714881) was determined to be under control. Therefore, 100% (56 out of 56) of the sites in the RCRA Post-Closure Universe are now considered to be under control. 2015 Status: 100% (56 out of 56) of the sites in the RCRA Post-Closure Universe are considered to be under control.
	Ensure groundwater monitoring at permitted facilities that treat, store and dispose of hazardous waste.	Terri Myers	USEPA: Report % of hazardous waste management facilities conducting detection monitoring and report % of hazardous waste management facilities conducting assessment/compliance monitoring. Illinois EPA: Currently 28% of hazardous waste management facilities are conducting detection monitoring. Currently 26% of hazardous waste management facilities are conducting assessment/compliance monitoring. The % of hazardous waste management facilities conducting detection monitoring or assessment/compliance monitoring will be updated as needed.	2014 Status: No change during FFY14. 2015 Status: No change during FFY15.
	Routine compliance monitoring activities	Todd Marvel	Conduct 17 Compliance Evaluation Inspections (CEI) at Treatment, Storage, Disposal Facilities (TSDFs)	2014 Status: BOL conducted 15 TSD CEIs in FFY 2014. Region 5 completed 2 TSD CEIs for a total of 17. 2015 Status: BOL conducted 14 TSD CEIs in FFY 2015. Region 5 completed 3 TSD CEIs for a total of 17.

		Todd Marvel	Conduct & Report Comprehensive Groundwater Monitoring Evaluations (CME) at TSDFs	<p>2014 Status: There are no CMEs to be conducted in FFY 2014.</p> <p>2015 Status: There are no CMEs to be conducted in FFY 2015.</p>
		Todd Marvel	Conduct 13 Operation & Maintenance (OAM) inspections at TSDFs	<p>2014 Status: BOL conducted 13 OAMs in FFY 2014.</p> <p>2015 Status: BOL conducted 10 OAMs in FFY 2015.</p>
		Todd Marvel	Conduct Compliance Schedule Evaluation (CSE) at TSDFs as needed.	<p>2014 Status: BOL conducted 1 CSE in FFY 2014.</p> <p>2015 Status: BOL conducted 1 CSE in FFY 2015.</p>




		Brian White	Conduct & Report Financial Record Reviews (FRR) at TSDFs	<p>2014 Status: BOL conducted 71 FRRs at 54 different TSDFs in FFY 2014 (not a national requirement).</p> <p>2015 Status: BOL has conducted 49 FRRs at 40 different facilities in FFY 2015 (not a national requirement).</p>
		Todd Marvel	Conduct & Report Non-Financial Record Reviews (NRR) at TSDFs & generators.	<p>2014 Status: BOL conducted 111 NRRs at 62 facilities in FFY 2014 (not a national requirement).</p> <p>2015 Status: BOL conducted 48 NRRs at 44 facilities in FFY 2015 (not a national requirement).</p>
		Todd Marvel	Conduct CEIs for large quantity generators (LQG) at 20% of LQG universe (140).	<p>2014 Status: BOL conducted 165 LQG CEIs in FFY 2014.</p> <p>2015 Status: BOL conducted 219 LQG CEIs in FFY 2015.</p>
		Todd Marvel	Conduct & Report CEIs conducted at small quantity generators.	<p>2014 Status: BOL conducted 85 CEIs at SQGs in FFY 2014 (not a national requirement).</p> <p>2015 Status: BOL conducted 55 CEIs at SQGs in FFY 2015 (not a national requirement).</p>
		Todd Marvel	Conduct & Report CEIs conducted at conditionally-exempt small quantity generators (CESQGs)	<p>2014 Status: BOL conducted 7 CEIs at CESQGs in FFY 2014 (not a national requirement).</p> <p>2015 Status: BOL has conducted 12 CEIs at CESQGs in FFY 2015 (not a national requirement).</p>
		Todd Marvel	Conduct & Report CEI for transporters	<p>2014 Status: BOL conducted 4 CEIs at Transporters in FFY 2014 (not a national requirement).</p> <p>2015 Status: BOL conducted 1 CEI at Transporters in FFY 2015 (not a national requirement).</p>
		Todd Marvel	Conduct & Report CEI for non-handlers & generator status not determined	<p>2014 Status: BOL does not gather accurate data on this inspection category, which is not a national requirement.</p>

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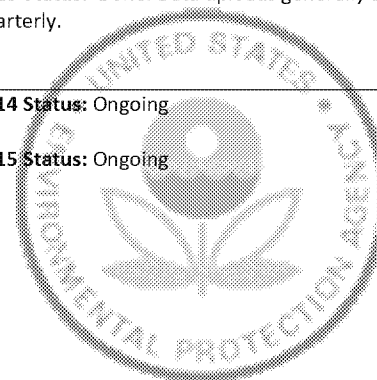
				2015 Status: BOL does not gather accurate data on this inspection category, which is not a national requirement.
	Non-routine compliance monitoring activities	Todd Marvel	Conduct & Report # of citizen complaints and investigations	2014 Status: BOL does not gather accurate data on this inspection category, which is not a national requirement. 2015 Status: BOL does not gather accurate data on this inspection category, which is not a national requirement.
		Todd Marvel	Conduct & Report follow-up inspections (FUI)	2014 Status: BOL conducted 29 FUIs at 28 different facilities in FFY 2014 (not a national requirement). 2015 Status: BOL conducted 61 FUIs in FFY 2015 (not a national requirement).
		Todd Marvel	Conduct & Report case development inspections	2014 Status: BOL did not conduct any CDIs in FFY 2014 (not a national requirement). 2015 Status: BOL did not conduct any CDIs in FFY 2015 (not a national requirement).
		Todd Marvel	Conduct & Report focused compliance inspections	2014 Status: BOL conducted 1 of 1 FCI's committed to in the PPA. 2015 Status: BOL conducted 11 FCI's in FFY 2015.
	RCRAInfo Data Management	Todd Marvel	Illinois EPA will timely enter all RCRAInfo data fields for which it is the State implementer of record (IOR). The IOR tables in RCRAInfo define the fields for which Illinois is the owner and has data entry responsibilities. Data will be entered within one month of the completion of any recordable RCRA program activity. Illinois EPA will also maintain and update implementer owned codes in the RCRAInfo look-up tables, will keep the RCRA program universe records current, and will submit	2014 Status: Done (ongoing) 2015 Status: Done (ongoing)

			biennial report files in accordance with timeframes established by EPA's Office of Resource Conservation and Recovery.	
	Oversight Arrangement	Todd Marvel	Illinois EPA will: <ul style="list-style-type: none"> a) Conduct an annual mid-year program meeting; b) Conduct at least quarterly program enforcement conference calls; c) Conduct joint inspections as needed or requested; d) Investigate and respond to inquiries from EPA concerning facilities that do not appear to have been timely and/or appropriately addressed under Illinois' enforcement program. This will include at least one annual meeting between EPA and Illinois EPA to discuss the file audit results. 	2014 Status: Completed 2015 Status: Completed
Work Plan Outputs/Measures/Outcomes – Underground Injection Control Program				
Grant Code CFDA 66.433	Template Measures	Contacts	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
		Bur Filson	Class I Inspections: Illinois EPA will conduct one inspection at each of the 3 Class I facilities annually covering the 4 Class I wells in the State's inventory.	2014 Status: All 3 Class I UIC facilities were inspected in FFY 2014. 2015 Status: All Class I facilities were inspected in FFY 2015.
		Bur Filson	Class I File Reviews: Illinois EPA will conduct monthly compliance reviews of required reports from operators (includes monthly monitoring reports and well log data).	2014 Status: Complete 2015 Status: Complete
		Bur Filson	Class I MITs (National Program Measure): Illinois EPA will ensure that 100% of Class I wells that lose MI are returned to compliance within 180 days. (SDW-7)	2014 Status: Ongoing. Instance of lost MI was addressed and well has returned to service. 2015 Status: No MI issues in FFY 2015

		Bur Filson	Review and process any new and renewal permit applications, as well as any permit modifications requests, in a timely manner.	<p>2014 Status: Ongoing. Temporary Class I emergency permit was issued.</p> <p>2015 Status: Ongoing. 11 final actions were taken during FFY 2015.</p>
		Bur Filson	<p>Class V Closures (National Program Measure): At the first year of this agreement, Illinois EPA has closed 4 high priority Class V wells found within Illinois wellhead protection areas. Illinois EPA will use informal methods and enforcement including, but not limited to, violation notices and compliance commitment agreements, to close Class V wells in sensitive areas.</p> <p>Illinois EPA will report the number of closed Class V wells and notify USEPA regarding progress in closing other Class V wells within sensitive areas in Illinois.</p> <p>Illinois EPA will continue efforts to review other wells as seemed appropriate per the state's criteria until such time as EPA and Illinois EPA agree on additional activities.</p>	<p>2014 Status: On going. Closed wells will be identified in the data uploaded to the national database.</p> <p>2015 Status: On going. Closed wells are and will be identified in the data uploaded to the national database.</p> 

		Bur Filson	Illinois EPA will provide updates and add new data to the national UIC database at least twice per year, April 15 and October 15, to satisfy the reporting needs formerly met through the submission of the 7520s and inventory.	2014 Status: Done 2015 Status: Done
		Bur Filson	Illinois EPA will continue to add new and update existing well records in the national UIC database at least twice per year, by April 15 and October 15. The transfer of all data presently maintained in an electronic format has been completed.	2014 Status: Done 2015 Status: Done. Data uploads generally are done quarterly.
		Bur Filson	Carbon Sequestration (National Program Indicator): Illinois EPA will carry out the following activities as resources allow. Illinois EPA will collaborate with USEPA on Class VI permits and on regional and national issues as they evolve, particularly in relation to primacy, regulatory developments, and policy changes. Illinois EPA and USEPA will facilitate interaction and exchange between key stakeholders such as DOE-funded research groups, other state and federal regulators, and environmental groups through avenues such as meetings and workshops to expand regional experience with and expertise on carbon sequestration.	2014 Status: Ongoing 2015 Status: Ongoing
Strategic Objective 3.2: Restore Land				
Work Plan Outputs/Measures/Outcomes – Resource Conservation & Recovery Act (RCRA)				
Grant Code CFDA 66.801	Template Measures	Contacts Jose Cisneros- EPA	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
	Number of 2020 GPRA	Rob Watson	Take necessary actions to help Region 5 to	2014 Status: In response to USEPA's request, IEPA

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	<p>baseline facilities with human exposures under control</p>		<p>achieve FY14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for.</p> <p>Illinois EPA will perform 2 additional CA725 determinations for a total of 110 of 126 (87%) in FFY14.</p> <p>Illinois EPA will perform 2 additional CA725 determinations for a total of 114 of 124 (92%) in FFY 15.</p>	<p>exceeded this goal by performing four CA725 Determinations on the following sites in FFY14:</p> <p>Brighton Landfill (ILD000667139) CA725 Determination completed on 3/6/2014.</p> <p>PCCR USA (ILD005083316) CA725 Determination completed on 6/30/14</p> <p>Allrite Sheet Metal (ILD984811539) CA725 Determination completed on 9/30/14</p> <p>Safety Kleen EnviroSystems Inc., Dolton (ILD980613913) CA725 Determination completed on 9/30/14</p> <p>IEPA has performed 112 of 126 CA725 determinations to date (89%).</p> <p>2015 Status: In response to USEPA's request, IEPA has exceeded this goal by performing three CA725 determinations at the following sites in FFY15:</p> <p>Dover Industrial Chrome Inc. (ILD005125588) CA725 Determination completed on 2/20/15</p> <p>Northrop Grumman Def. Systems (ILD005128988) CA725 Determination completed on 3/26/15</p> <p>Quality Carriers (ILD049812696) CA725 Determination completed on 7/30/2015</p> <p>IEPA has performed 116* of 124* CA725 determinations to date (93%).</p> <p>*The number of determinations performed and number of sites vary between FFY14 and FFY15 due to the redistribution of CA2020 sites between USEPA</p>
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				and IEPA.
	Number of 2020 GPRA baseline facilities with migration of contaminated groundwater under control	Terri Myers	<p>Take necessary actions to help Region 5 to achieve FY 14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for.</p> <p>Illinois EPA will perform 2 additional CA750 determinations for a total of 93 of 126 (74%) in FFY14.</p> <p>Illinois EPA will perform 2 additional CA750 determinations for a total of 95 of 124 (77%) in FFY15.</p>	<p>2014 Status: IEPA met this goal by performing CA750 Determinations on the following sites in FFY14:</p> <p>Brighton Landfill (ILD000667139) CA750 Determination completed on 4/11/2014.</p> <p>Centerpoint Properties (ILD079751319) CA750 Determination completed on 4/11/2014</p> <p>IEPA has performed 93 of 126 CA750 determinations to date (74%).</p> <p>2015 Status: In response to USEPA's request, IEPA exceeded this goal by performing four CA750 Determinations on the following sites in FFY15:</p> <p>All Steel (ILD000716886) CA750 Determination completed on 3/20/15</p> <p>Bridgestone Firestone (ILD005199013) CA750 Determination completed on 3/20/15</p> <p>Dover Industrial Chrome Inc. (ILD005125588) CA750 Determination completed on 3/20/15</p> <p>Safety Kleen Corp. Dolton (ILD980613913) CA750 Determination completed on 3/20/15</p> <p>IEPA has performed 98* of 124* CA750 determinations to date (79%).</p> <p>*The number of determinations performed and number of sites vary between FFY14 and FFY15 due to the redistribution of CA2020 sites between USEPA and IEPA.</p>

	<p>Number of 2020 GPRA baseline facilities with remedy construction complete</p>	<p>Rob Watson</p>	<p>Take necessary actions to help Region 5 to achieve FY14 and FY15 GPRA goals for the 126 of 150 sites that Illinois EPA is responsible for.</p> <p>Illinois EPA will perform 2 additional CA550 determinations for a total of 71 of 126 (56%) in FFY14.</p> <p>Illinois EPA will perform 2 additional CA550 determinations for a total of 73 of 124 (59%) in FFY15.</p>	<p>2014 Status: IEPA met this goal by performing CA550 Determinations on the following sites in FFY14:</p> <p>Centerpoint Properties (ILD079751319) CA550 Determination completed on 3/28/2014</p> <p>Precision Chrome (ILD089062871) CA550 Determination completed on 6/30/14</p> <p>IEPA has performed 71 of 126 CA550 determinations to date (56%).</p> <p>2015 Status: In response to USEPA's request, IEPA exceeded this goal by performing 13 CA550 Determinations on the following sites in FFY15:</p> <p>Allrite Sheet Metal (ILD984811539) CA550 Determination completed on 1/22/2015</p> <p>Bridgestone Firestone (ILD005199013) CA550 Determination completed on 1/14/15</p> <p>Dover Industrial Chrome Inc. (ILD005125588) CA550 Determination completed on 2/20/15</p> <p>Maytag, Galesburg Refrig Prod (ILD067417337) CA550 Determination completed on 1/22/15</p> <p>Rock Tenn Co (ILD006195853) CA550 Determination completed on 1/22/15</p> <p>Alberto Culver Co (ILD005071378) CA550 Determination completed on 6/3/2015</p> <p>Quality Carriers Inc. (ILD049812696)</p>
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				<p>CA550 Determination completed on 7/30/2015</p> <p>Safety Kleen Corp Dolton (ILD980613913) CA550 Determination completed on 7/30/2015</p> <p>Revere Ware Corp (ILD005078274) CA550 Determination completed on 8/6/2015</p> <p>Hentzen Coatings Inc (ILD095309647) CA550 Determination completed on 8/21/2015</p> <p>Lonza Inc (ILD001643659) CA550 Determination completed on 9/16/2015</p> <p>Northrop Grumman Def. Systems (ILD005128988) CA550 Determination completed on 9/18/2015</p> <p>J and M Plating Inc (ILD990783995) CA550 Determination completed on 9/25/2015</p> <p>IEPA has performed 84 of 124* CA550 determinations to date (68%).</p> <p>In addition, IEPA completed a CA550 determination on the following USEPA lead site:</p> <p>Escast Inc (ILD000672139) CA550 Determination completed on 6/16/2015</p> <p>*The number of determinations performed and number of sites vary between FFY14 and FFY15 due to the redistribution of CA2020 sites between USEPA and IEPA.</p>
		Todd Marvel	Require investigation and cleanup of releases at hazardous waste management facilities.	<p>2014 Status: Ongoing</p> <p>2015 Status: Ongoing</p>
		Brian White	Financial Record Reviews (FRR), Illinois EPA will conduct financial assurance reviews to	<p>2014 Status: All RCRA TSDs are evaluated for compliance with financial assurance requirements on</p>

			verify compliance status with the RCRA financial assurance requirements.	<p>at least a biennial basis.</p> <p>2015 Status: All RCRA TSDs are evaluated for compliance with financial assurance requirements on at least a biennial basis.</p>
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Strategic Goal 5: Enforcing Environmental Laws				
Strategic Objective 5.1: Enforce Environmental Laws				
Work Plan Outputs/Measures/Outcomes – Office of Solid Waste and Emergency Response				
Grant Code CFDA 66.605	Template Measures	Contacts Mardi Klevs- EPA	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
	TSCA Activities	Beth Unser	Conduct routine TSCA inspections statewide as mutually agreed. Illinois EPA will perform 26 PCB inspections for FY14/15. Inspections will be targeted according to joint inspection priorities determined by Illinois EPA and USEPA. At least 5 inspections will be conducted at natural gas pipeline compressor stations. Natural gas inspections will be done at both interstate and local distribution companies.	2014 Status: 26 PCB inspections have been completed, including 5 conducted at natural gas pipeline facilities requested by USEPA. 2015 Status: 26 PCB inspections have been completed, including 4 conducted at natural gas pipeline compressor stations.
		Beth Unser	Submit inspection reports in a timely manner, including quarterly spreadsheet of the inspections conducted. Each inspection report will include mention as to whether the area where the inspection took place meets the State's environmental justice criteria.	2014 Status: Ongoing 2015 Status: On schedule. EPA Response: 2014 Status: Completed
		Beth Unser	Will provide oversight of PCB remediation activities by site visits or written or verbal communication.	2014 Status: USEPA initially requested oversight at one facility, Westwick Foundry in Galena, IL. USEPA subsequently requested that oversight site visit be delayed until FFY 2015. Therefore, no oversight has been requested for FFY 2014. 2015 Status: A site visit was conducted at Westwick Foundry (Galena) to confirm completion of PCB remediation activities.
		Beth Unser	Continue participation in USEPA's digital inspector program by gathering inspection	2014 Status: Project on hold due to technical issues. 2015 Status: Project still on hold.

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			data electronically and will update equipment and software as funding allows.	
		Beth Unser	Inspectors will attend annual training.	2014 Status: Done 2015 Status: Done.
Work Plan Outputs/Measures/Outcomes – Enforcement and Rules Development/Authorization				
Grant Code CFDA 66.801	Template Measures	Contacts Gary Victorine-EPA	Performance Partnership Agreement Planned Activities	Performance Partnership Grant Status/Progress
	Enforcement and Rules Development Activities	Dan Merrimam	Report number of referrals to Illinois EPA's Criminal Enforcement Decision Group and to prosecutorial authorities (hazardous waste cases.)	2014 Status: 1 referral was made to CEDG during FFY 2014. That case was referred to USEPA CID for investigation. 2015 Status: One referral to CEDG in June 2015 and one expedited referral to USEPA CID (St. Louis office) in August 2015.
		Todd Marvel	Illinois EPA will review and ensure the accuracy of the adoption of RCRA rules promulgated by USEPA in a timely manner.	2014 Status: Completed 2015 Status: Completed
		Todd Marvel	Illinois EPA will submit Authorization Revision Application (ARA) 9, which will include all applicable RCRA rules promulgated to date.	2014 Status: Submittal of ARA 8 has been delayed until early in FFY 2015 due to the IAGO's ongoing review of the AG Statement. 2015 Status: ARA 8 was submitted to Region 5 in FFY 2015. ARA 9 is complete pending the IAGO certification of the AG Statement and will be submitted to Region 5 once ARA 8 has been approved. The Program Description for ARA 10 has been completed and will be submitted to Region 5 upon approval of ARA 9. ARA 10 will bring Illinois up to date on the authorization of all RCRA rules.
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1: Protect Human Health				
Work Plan Outputs/Measures/Outcomes – Carbon Sequestration				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement	Performance Partnership Grant

			Planned Activities	Status/Progress
Joint Priority	Volume of CO2 sequestered through injection as defined by the UIC Final Rule.	Bur Filson	Illinois EPA will continue to participate in the Midwest Geological Sequestration Consortium (MGSC).	2014 Status: Ongoing. 2015 Status: Ongoing.
Joint Priority	Number of permit decisions during the reporting period that result in CO2 sequestered through injection as defined by the UIC Final Rule.	Bur Filson	USEPA currently has Class VI permitting authority. Illinois EPA will continue to collaborate with USEPA on carbon sequestration issues.	2014 Status: Ongoing. 2015 Status: Ongoing.
Environmental Justice	Screen all incoming permit actions/applications for potential Environmental Justice (EJ) issues.	Ken Page	In accordance with the EJ Public Participation report all proposed permitting actions for facilities located in potential EJ areas as determined by Illinois EPA's screening tool to the EJ Officer for further outreach.	2014 Status: All applications are being screened. 2015 Status: All proposed permitting actions in the Bureau continue to be screened for potential Environmental Justice using the EJSTART, the Illinois EPA's EJ screening tool.

Attachment C: Bureau of Water

Illinois Environmental Protection Agency 2014/2015 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.1: Water Safe to Drink				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Dave McMillan	In FY2014 and FY15, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	<p>2014 Status: 98.3% (11,799,885 of 12,003,753) of the community water systems in Illinois are in compliance with drinking water standards.</p> <p>2015 Status: 97.7% (11,733,089 of 12,009,784) of the community water systems in Illinois are in compliance with drinking water standards.</p>
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Dave McMillan	In FY2014 and FY15, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	<p>2014 Status: 95.2% (1,660 of 1,744) of the population served by community water supplies is receiving drinking water that is in compliance with MCLs.</p> <p>2015 Status: 95.9% (1,673 of 1,743) of the population served by community water supplies is receiving drinking water that is in compliance with MCLs.</p>
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Dave McMillan Rick Cobb	In FY2014 and FY15 minimize risk to public health through source water protection for 50% of CWSs (i.e. "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	<p>2014 Status: 48.7% (851 of 1,747) of community water systems have source water protection programs in place to minimize risk to public health.</p> <p>2015 Status: 49.5% (863 of 1,743) of community water systems have source water protection programs in place to minimize risk to public health.</p>

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SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Dave McMillan Rick Cobb	By FY2014 and FY15, minimize risk to public health through source water protection for 42% of the population served by CWSs (i.e. "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy.)	<p>2014 Status: 71% (8,581,092 of 12,093,167) of the population served by community water systems have source water protection programs in place to minimize the risk to public health.</p> <p>2015 Status: 73.4% (8,814,483 of 12,009,784) of the population served by community water systems have source water protection programs in place to minimize the risk to public health.</p>
SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment Rules.	Dave McMillan Rick Cobb	In FY2014 and FY15, 90% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules	<p>2014 Status: At this time, there are 1,744 Community Water Supplies in Illinois. 1,637 CWSs have been inspected within the three year time frame ending September 30, 2014 (or 93.8%).</p> <p>2015 Status: 91.2% (1,590 of 1,743 CWSs have been inspected)</p>
SDW-SP2	By FY2012, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of "person months" (i.e., all persons served by CWSs times 12 months).	U.S. EPA, Region 5	This measure is generated by U.S. EPA through a database query and calculation with a target of 95% person months of the affect population receiving compliant water.	<p>2014 Status:</p> <p>2015 Status:</p>
SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds	Gary Bingenheimer	The Illinois EPA will maintain a pace of loan program activity that maximizes the availability of low interest financing for public water supply projects in Illinois.	<p>2014 Status: FFY2014: \$196,371,010 (cumulative DWSRF loan agreement dollars October 1, 2013-Sept. 30, 2014) divided by \$196,371,010 (cumulative funds available from federal grant, state match, repayments,</p>

	available for projects) for the Drinking Water State Revolving Fund (DWSRF).			<p>fund equity and future leveraged bond proceeds) yields a fund utilization rate of 100%.</p> <p>2015 Status: FFY2015: \$115,680,484 (cumulative DWSRF loan agreement dollars October 1, 2014-Sept. 30, 2015) divided by \$115,680,484 (cumulative funds available from federal grant, state match, repayments, fund equity and future leveraged bond proceeds) yields a fund utilization rate of 100%.</p>
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative)	Gary Bingenheimer	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	<p>2014 Status: FFY2014: 20 new DWSRF loan projects initiated operations for a cumulative total of 37 for FFY2014.</p> <p>2015 Status: 17 new DWSRF loan projects initiated operations for FFY2015.</p>
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.3 Water Safe for Swimming				
Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SS-1		Amy Dragovich	<p><u>Combined Sewer Overflow (CSO) Permits</u> – Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable.</p> <p>Illinois EPA commits to requiring monitoring and then determining if water quality standard limits are necessary on blended flows.</p>	<p>2014 Status: Several permits are in the process of being drafted. All draft major CSO permits are forwarded to USEPA during the 15-day comment period. The Kankakee River Metropolitan Agency (KRMA) draft NPDES permit was forwarded to USEPA on Feb 18, 2014. USEPA and Illinois EPA discussed the template language for the CSO special condition on July 31, 2014. Expired CSO permits are in the process of being revised. Comments on the KRMA draft permit were received from USEPA on 4/3/2014. The NPDES permit is currently being revised to</p>

				<p>incorporate July 31, 2014 revisions. The revised KRMA draft permit was forwarded to USEPA on 9/4/2014. The Agency had additional discussions with USEPA on the template language on August 28, 2014. The Fox Metro draft permit was forwarded to USEPA on August 28, 2014. The Fox River South draft permit was forwarded to USEPA on September 16, 2014.</p> <p>USEPA forwarded additional comments on the KRMA draft permit on 12/4/2014. They are currently under review. Revisions to the CSO template language were forwarded to USEPA on November 14, 2014. The Agency had additional discussions with USEPA on the template language on December 9, 2014. Revisions are currently being made to address USEPA comments. A draft objection letter was received on October 23, 2014 for the Fox Metro draft NPDES permit. The Agency had a conference call with USEPA on October 30, 2014 to discuss the Fox Metro and Fox River South draft permits. The draft permits are currently being revised.</p> <p>2015 Status: Revised template language was forwarded to USEPA on 1/22/15 and 4/16/15 (a Word version). <u>USEPA is currently reviewing the template language.</u> A conference call was held with KRMA on 3/19/15. They submitted a No Feasible Alternative analysis on 7/31/15. USEPA forwarded their approval of the draft permit on 9/10/15. However, the facility has submitted additional comments to USEPA and requests that we hold the permit until USEPA responds. The Fox Metro NPDES was issued 6/1/15. The Fox River South NPDES</p>
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				<p>was issued 6/1/15. The Metropolis NPDES was issued 5/8/15. Additional major CSO permits that have been drafted to include CSO language include LaSalle South (issued 11/23/15), Ottawa, Joliet Eastside, (EPA Response: (pending resolution of the listed performance of "no more than 4 overflows per year" for Joliet Eastside)), MWRDGC Lemont, Belleville (issued 10/1/15) and Taylorville (issued 5.6.15). Major NPDES permits will be forwarded to USEPA for review. This is an ongoing activity.</p> <p>EPA Response: Agreement was reached with IEPA and EPA that EPA R5 does not intend to object to permits with excess flow treatment system discharges that are blended with main plant flow, as long as:</p> <ol style="list-style-type: none"> 1. the excess flow unit would not be used (and discharged) unless the main treatment flow had reached its Daily Maximum Flow (DMF) (with rate listed in gpm units); and 2. blended flows are required to achieve secondary treatment level. <p>Appropriate standardized nomenclature was developed for typical blended outfalls (B01; A01; 001).</p> <p>Secondary treatment for blended flow is defined to include Biological Oxygen Demand (BOD)/Total Suspended Solids (TSS) % removal (and definitely for sanitary sewer system plants).</p>
		Amy Dragovich	Illinois EPA will utilize the permit language pertaining to all wet weather discharges, as approved by USEPA, to assure compliance with Clean Water Act requirements.	<p>2014 Status: Revised language for excess flow facilities was received from USEPA on July 23, 2014. The St. Charles, Geneva, Fox River North, Batavia, and Carpentersville</p>

				<p>NPDES permits have been revised and forwarded back to USEPA. USEPA forwarded "No Objection Letters" for the St. Charles, Geneva, Fox River North, Batavia and Carpentersville NPDES permits.</p> <p>Revised St. Charles and Fox River North NPDES permits were forwarded to USEPA on October 3, 2014 with their public notices. The St. Charles and Fox River North NPDES post public notice proposed permits were forwarded to USEPA on November 14, 2014. The St. Charles and Fox River North NPDES permits were issued November 21, 2014. A revised Batavia NPDES permit was forwarded to USEPA on December 11, 2014 to address comments from the facility. The Geneva and Carpentersville post public notice proposed permits were forwarded to USEPA on December 10, 2014 and December 11, 2014 respectively. The Barrington draft NPDES permit was forwarded to USEPA on October 21, 2014.</p> <p>2015 Status: All permits with excess flows are being revised to incorporate the language from USEPA. The Batavia NPDES permit was issued 1/28/15, the Geneva NPDES permit was issued 1/8/15, the Carpentersville NPDES permit was issued 1/8/15 and the Barrington NPDES permit was issued 6/12/15. This is an ongoing activity.</p> <p>EPA Response: Another wet weather strategy that the IEPA and EPA R5 have been requested to evaluate is the use of variable BOD and TSS limits which would be</p>
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				calculated (and allowed to be higher than the values listed in the regulations for "secondary treatment") based on the number of discharges from the excess flow unit per month. As of this writing, this approach has not been found to be acceptable by EPA Office of Water. This issue may affect at least 3 permits that have initially requested this approach: North Shore WRD's: Clavey Road; Waukegan; and Gurnee.
		Amy Dragovich	Illinois EPA will provide a pre-public notice permit for the City of Chicago CSO permit upon issuance of the MWRDGC permits and issue a final permit within 90 days of issuing MWRD permits for Stickney, Northside, and Calumet WRPs, unless a public hearing is necessary. If a public hearing is necessary, the permit will be provided within 90 days of the hearing date.	<p>2014 Status: Had several rounds of comments with USEPA; draft permit is back with City.</p> <p>2015 Status: The City of Chicago CSO NPDES permit went to public notice 2/27/15. The Sierra Club and the Alliance for the Great Lakes requested a hearing, which was held 6/30/15. Comments are currently being placed into the responsiveness summary by Agency Community Relations staff.</p> <p>EPA Response: On August 4, 2015, EPA received a copy on NRDC's letterhead dated July 31, 2015, containing six Environmental groups' comments on the Public notice "City of Chicago Combined Sewer Overflows (CSO) permit". IEPA has not issued a responsive summary to date.</p>
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated in to an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: Implementation of an approved Long	2014 Status: The Casey North NPDES was issued 7/15/2014 and includes the LTCP schedule. Four additional permits are in the process of being drafted to include the LTCP schedules. The draft Ottawa NPDES was forwarded to USEPA 6/30/14 with the LTCP

			<p>Term Control Plan (LTCP); or Implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.</p>	<p>schedule. USEPA requested a copy of the approved Ottawa LTCP on July 17, 2014. A copy was forwarded to USEPA. USEPA is currently reviewing. USEPA forwarded a draft objection letter for the Ottawa draft permit on September 17, 2014.</p> <p>The Agency had additional discussions with USEPA on the Ottawa draft permit. The revised Ottawa draft permit was forwarded to USEPA on December 3, 2014.</p> <p>2015 Status: USEPA forwarded additional comments on the Ottawa NPDES permit on 1/15/15 and 3/13/15. Additional discussions with USEPA were held 2/19/15 and 4/13/15 regarding the incorporation of approved Long Term Control Plans into NPDES permits. The revised Ottawa draft permit and LTCP Review Analysis Form were forwarded to Ottawa on 4/13/15. Additional comments were received from the City on 5/12/15. The proposed permit was forwarded back to USEPA on 9/10/15. USEPA issued a "No Objection Letter" on 9/23/15, along with several recommendations. The NPDES permit expired 9/30/15 and is currently in the process of being renewed. The renewal will incorporate USEPA's comments and the LTCP schedule. The Fox Metro NPDES was issued 6/1/15 with a LTCP implementation schedule. (EPA Response: Major objections to the Ottawa permit have been received from the City of Ottawa since Region 5 sent out no objection letter on September 23, 2015. In addition to possible impacts of the City's objections, the Ottawa permit will also</p>
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				<p>need to be revised based on the fact that significant changes were made to the draft permit after the "no Objection" letter was issued by EPA R5 on September 30, 2015). The City of Metropolis NPDES was issued 5/8/15 with a LTCP implementation schedule. The Village of Hinsdale CSO NPDES permit was issued 8/4/15 with a LTCP implementation schedule. This is an ongoing activity.</p> <p>EPA response: Much discussion has occurred between IEPA and EPA Region 5 on strategy and language necessary to achieve the requirements for Phase 2 CSO Permits. Permits which have already been assumed to meet the presumptive approach need to include Water Quality (WQ) verification of meeting it, and the schedule for doing the work and sending in the WQ summary report (e.g. Pontiac, Illinois). With respect to the communities that have not yet met the presumptive approach, the Long Term Control Plans (LTCP) must be reviewed by IEPA and certified by IEPA that it is likely that the WQ goals of the CSO Policy will be met by implementing the approvable LTCP (using the "LTCP Analyses Tool" to include in the record; Ottawa; Joliet; etc.).</p>
SS-1 + Clean Water Action Plan		Amy Dragovich	<p>nce the schedule is finalized Illinois EPA will send an update to Region 5 by the end of every month. Illinois EPA will update USEPA CSO LTCP status spreadsheet, internal monthly reporting, and to track progress toward meeting goals under the CSO Control Plan Policy.</p>	<p>2014 Status: Updates were forwarded to USEPA on 10/21/2013, 1/7/2014, 2/5/2014, and 2/27/2014. Additional updates/comments were forwarded to USEPA on 5/20/2014 and 7/15/2014 Latest sent to USEPA - October 2014.</p> <p>2015 Status: Status updates were forwarded</p>

				to USEPA on 10/1/14, 1/7/15, 3/25/15, 6/29/15 and 10/1/15. <u>Once the template language is finalized, additional permits can be issued to include their LTCP schedule.</u> The spreadsheet will be updated as additional permits are issued.
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis				
Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative)	Gary Bingenheimer	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the "green project reserve".	2014 Status: FFY2014: 23 new loan CWSRF projects initiated operations for a cumulative total of 43 for FFY2014. 2015 Status: FFY2015: 28 new loan CWSRF projects initiated operations for FFY2015.
SP-10	Measure W	Amy Walkenbach	Measure W tracks watersheds where water quality conditions have improved by using a watershed approach. One of the primary purposes of this measure is to model and demonstrate the effectiveness of the watershed approach. Illinois EPA has previously submitted Jelkes Creek, Dutchman's Creek, Governor Bond Lake and Pittsfield watersheds. We now submit Indian Creek-Lake County and Lake Vermilion for consideration under this measure.	2014 Status: Indian Creek – Full use. Draft 2014 IR Vermilion Draft 2014 IR TSS no longer a cause. Need to select new watersheds. All current are meeting WQ standards and/or are full use. 2015 Status: Illinois submits HUC0712000609, Wonder Lake Watershed as the next Measure W watershed. Segments RTZC (Wonder Lake), DTK-06 (Nippersink Creek) are impaired due to nonpoint source pollution, these pollutants (total phosphorus and fecal coliform bacteria) should be removed from the 303(d) List in the future due to restoration activities.
	Number of waterbodies identified in 2002 as not	Amy Walkenbach	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database.	2014 Status: USEPA Responsibility

	attaining water quality standards where standards are now fully attained (cumulative.)			2015 Status: USEPA Responsibility
WQ01a	Number of numeric water quality standards for total nitrogen and for total phosphorus adopted by States & Territories and approved by USEPA, or promulgated by EPA, for all waters within the State or Territory for each of the following waterbody types: lakes/reservoirs, rivers/streams, and estuaries (cumulative, out of a universe of 280.)	Bob Mosher	The Illinois EPA will continue to work with Region 5 to adopt nutrient water quality standards.	<p>2014 Status: Nutrient Standards Adoption. Workgroup #1 (revisions to narrative standard) met once in 2014. Workgroup #4 (protection for low-phosphorus streams) met twice in 2014. Draft language for the narrative standard and low P streams has been written. Draft language has been provided to USEPA staff, for their comments/concerns. Standards Unit has participated in the IL Nutrient Reduction effort by tabulating data and attending meetings.</p> <p>Draft Nutrient Loss Reduction Strategy identifies a process and timeline for developing numeric nutrient criteria, beginning in early 2015 and leading to a proposal to the Illinois Pollution Control Board August 2017.</p> <p>2015 Status: After several rounds of review of the draft, Region 5 reports that they have no issues with the current draft of the proposed narrative standard.</p>
		Bob Mosher	Illinois EPA will continue participation in the Regional effort to develop nutrient criteria guidance through its membership in the Regional Technical Assistance Group.	<p>2014 Status: Nutrient RTAG. We continue to attend all monthly RTAG Calls and attended the Numeric Criteria meeting in early February in Chicago, giving a presentation on Illinois nutrient standards development and participating in all discussions.</p> <p>2015 Status: All Monthly calls were</p>

		Bob Mosher	Coordinator will work with the Science Committee of the Nutrient Standards Workgroup.	attended. 2014 Status: Nutrient Workgroups. Workgroup #4 met twice and Workgroup #1 met once in 2014. Other workgroups have completed their goals. 2015 Status: Nutrient Workgroup activity for existing groups is most likely complete. A Nutrient Science Advisory Committee has been formed per the Illinois Nutrient Loss Reduction Strategy. This group is tasked with developing numeric water quality standards for nutrients. The initial meeting of this committee was held November 19, 2015.
WQ26	Number of states and territories implementing nutrient reduction strategies by (1) setting priorities on a watershed or state-wide basis, (2) establishing nutrient reduction targets, and (3) continuing to make progress (and provide performance milestone information to EPA) on adoption of numeric nutrient criteria for at least one class of waters by no later than 2016	Bob Mosher Marcia Willhite	<p>Statewide Nutrient Reduction Strategy—Illinois EPA, in collaboration with the University of Illinois, Illinois Department of Agriculture and a broad range of stakeholders, will develop a statewide nutrient reduction strategy, focused on in-state water quality impairments as well as contribution to Gulf of Mexico hypoxia, based on the 2011 USEPA framework. A final strategy will be provided to Region 5 by August 2014.</p> <p>Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates from mutual agency agreement, as needed each summer if there has been slippage to major milestones in the plan.</p> <p>Illinois EPA will commit to the following timeline:</p> <p>Nomination & selection of members – January-March 2015</p> <p>Committee convenes & conducts review – April</p>	<p>2014 Status: A draft document entitled “Nutrient Loss Reduction Strategy” has been prepared and was released for public review and comment on November 24, 2014. The draft document identifies priority watersheds and establishes nutrient reduction milestones (Total P-25% by 2020 and Total N – 15% by 2025) and goals (45% each for total P & N). Draft Nutrient Loss Reduction Strategy proposes establishment of a science advisory committee, beginning in January 2015 to review existing research and advise Illinois EPA on next steps for numeric nutrient criteria.</p> <p>2015 Status:</p> <ul style="list-style-type: none"> • Final Nutrient Loss Reduction Strategy published July 2015. • A draft narrative water quality standard (“Offensive Conditions”) is complete. This was shared with Region 5 and no further comments are forthcoming.

			<p>2015-September 2016 Committee presents determination(s) – October 2016 Outreach & discussion among stakeholders – November 2016-2017 Illinois EPA develops rulemaking package – April-July 2017 Illinois EPA files rule(s) with the Illinois Pollution Control Board – August 2017</p>	<p>• A Nutrient Science Advisory Committee has been formed per the Illinois Nutrient Loss Reduction Strategy. This group is tasked with developing numeric water quality standards for nutrients. The committee initially met on November 19, 2015.</p>
WQ03a	<p>Number and national percent of States & Territories that within the preceding 3 year period, submitted new or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not considered in the previous standards.</p>	Bob Mosher	<p>Consistent with the requirements of 40 CFR 131.20(c) where Illinois EPA proposes new or revised criteria that differ from USEPA's recommended criteria or for parameters where there are no USEPA recommended criteria, Illinois EPA will provide technical documentation for the decision it makes with respect to selecting data for use in calculating the criteria.</p> <p>Where USEPA national criteria exist, Illinois EPA will announce in its annual program plan, beginning in FY13, what standards, such as ammonia, human health narrative, bacteria, it will seek to update through the Illinois Pollution Control Board.</p> <p>By September 30, 2013, Illinois EPA and U.S. EPA will discuss Illinois EPA's review of adjusted standards and site specific criteria approved by Illinois PCB since January 2000 to identify those which should have been submitted to USEPA for its approval under Section 303(c) of the Clean Water Act. By October 31, 2013, Illinois EPA and EPA will develop a plan to bring such regulatory reliefs into compliance with the Clean Water Act requirements.</p> <p>Illinois EPA commits to submitting ammonia criteria rulemaking package to the Illinois Pollution Control</p>	<p>2014 Status: Triennial Review of Standards. We will announce our Triennial Review lineup in a public notice that will solicit suggestions and comments from interested stakeholders. This will include nutrient standards, bacteria and ammonia.</p> <p>USEPA deferred meeting with us to review adjusted standards and site specific criteria in 2014; however, Illinois EPA will initiate a discussion in early 2015.</p> <p>2015 Status: IEPA received a 106 supplemental grant to study recreational potential and mollusk presence/habitat in receiving streams for NPDES permitted discharges. Between May and October of 2015, 60 facilities were surveyed. Information gathered has been used to refine survey protocols for recreational use surveys regarding bacteria water quality standard implementation, i.e., disinfection exemptions/UAA's. Likewise, mussel surveys have provided information relevant to mussel survey protocol pertinent to a designation of mussels present/absent for application of future ammonia water quality standards. Sample reports regarding these</p>

			<p>Board by December 2016.</p> <p>Illinois EPA will discuss with U.S. EPA the rationale to support Illinois EPA's position on how the adjusted standards can get removed from Illinois' WQS if they have not officially expired.</p>	<p>surveys are being prepared for submittal to Region 5. The information gained through the grant will allow updated water quality standards for bacteria and ammonia to be properly assigned to streams in Illinois at the time of IPCB adoption of those standards. Filing of the rulemakings is anticipated to occur in late 2017.</p> <p>EPA Response: EPA issued its approval of Illinois' last triennial review on May 28, 2013. The next WQS submission qualifying as a triennial review would therefore be due three years from the date EPA received the last submission, April 2, 2016. EPA continues to provide technical support to the IEPA on ongoing WQS work.</p> <p>Regarding adjusted standards, we still need to discuss their current status.</p>
WQ04a	<p>Percentage of submissions of new or revised water quality standards from States and Territories that are approved by EPA.</p> <p>Human Health Criteria</p>	<p>[Note to IEPA: WQ04a is the measure that's most relevant to the WQS actions listed below.]</p> <p>Bob Mosher</p>	<p>Illinois EPA will propose updated human health criteria within the triennial review period beginning in FY14.</p>	<p>2014 Status: Given that USEPA is finalizing an updated human health criteria methodology, Illinois EPA, with agreement from Region 5, has withdrawn this item from the current list of objectives. Upon USEPA finalization of the updated human health methodology, Illinois EPA will include development of new human health water quality standards in a future triennial review of standards.</p> <p>2015 Status: IEPA awaits release of USEPA human health criteria updates. This commitment should be deleted until the final USEPA HH Criterion is published.</p> <p>EPA Response: EPA published final updated</p>

				human health water quality criteria on August 15, 2015. As stated above, the IEPA should now include development of new human health standards at the soonest available rulemaking opportunity.
	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Bob Mosher	Illinois EPA will propose an update for bacteria standards to the Illinois Pollution Control Board by December 2015.	<p>2014 Status: <u>Bacteria WQS</u>. Region 5 commented on an initial draft to update IL WQS to include E. coli bacteria criteria consistent with the recently finalized National Recreation Criteria. A meeting was held to discuss the comments.</p> <p>2015 Status: Given the monitoring work outlined above, the proposal for update of bacteria standards will most likely occur in December 2017.</p>
	Great Lakes Initiative Clearinghouse	Bob Mosher	If any criteria applicable to the Great Lakes are updated, Illinois EPA will send USEPA completed criteria templates and fact sheets for upload to the GLI Clearinghouse.	<p>2014 Status: <u>Great Lakes Clearing House</u>. There was no derivation of water quality standards applicable to lake Michigan, so no submission to the Clearinghouse was made.</p> <p>2015 Status: <u>Great Lakes Clearing House</u>. There was no derivation of water quality standards applicable to Lake Michigan, so no submission to the Clearinghouse was made.</p>
	Endangered Species Act Consultation	Bob Mosher	Illinois EPA will assist USEPA in coordinating with U.S. Fish and Wildlife Service on draft and final new and revised water quality standards.	<p>2014 Status: Endangered Species Act Consultation. We were not asked to help on this issue this year.</p> <p>2015 Status: IEPA has not been asked to help on such a project this year.</p>
	Lower Des Plaines River & Chicago Area Waterway UAA	Roy Smogor Bob Mosher Scott Twait	Illinois EPA will continue to support completion of the rulemaking and will actively work with USEPA to address concerns raised on proposed rules and U.S. EPA disapproved rules.	2014 Status: The Agency is continuing to support the completion of the rulemaking and has made significant progress. The Illinois PCB has issued the first notice for Subdocket D and accepted comments until

			Within 18 months of USEPA's action on Sub-docket D, the Agency will submit a rulemaking package to the Board addressing all of EPA's disapproval items.	<p>November 21, 2014. The Illinois PCB may set a date for response to comments. The next step is second notice and final promulgation of the proposed water quality standards.</p> <p>2015 Status: The Illinois Pollution Control Board adopted Subdocket D on June 18, 2015. IEPA has not yet submitted the rules for USEPA approval, pending resolution of USEPA concerns about the impact of variance requests currently before the Board.</p>
	Status of Illinois' monitoring strategies and other initiatives	Gregg Good	Ambient Water Quality Monitoring Network – Illinois EPA will conduct monitoring activity at 146 ambient stream stations nine times annually (approximately every six weeks).	<p>2014 Status: All 146 sites are being monitored by Illinois EPA, ISWS, and USGS.</p> <p>2015 Status: All 146 sites have been monitored as planned by Illinois EPA, ISWS, and USGS.</p>
		Gregg Good	Intensive Basin Surveys – Illinois EPA will conduct Intensive Basin Survey monitoring activities at approximately 125-140 sites annually. Major river basins planned to be monitored in FY14 include the Green, Upper Illinois, Vermilion (Illinois River), Mississippi Central, Mississippi North Central, Bear, Mississippi South, and Cache. Major river basins planned to be monitored in FY15 include the Mississippi North, Apple/Plum, Kankakee, Iroquois, Mackinaw, Spoon, Mississippi South Central, Wood/Piasa, Saline, and Ohio River tributaries.	<p>2014 Status: Intensive Basin Survey monitoring was completed as scheduled.</p> <p>2015 Status: Monitoring was completed as planned in the basins described.</p> <p>EPA Response: Can IEPA now show how many sites were sampled in 2014 and 2015 as part of the Intensive Basin Surveys?</p>
		Gregg Good	Facility-Related Stream Surveys – Illinois EPA will conduct up to five (5) facility-related stream surveys annually	<p>2014 Status: 3 FRSS were conducted: 1) on the Mary's River downstream of Peabody Mine near Coulterville, 2) Clifton & 3) Industry Mine.</p> <p>2015 Status: No FRSS's were conducted in FFY15.</p>
		Gregg Good	Ambient Lake Monitoring Program – Illinois EPA	2014 Status: Monitoring was completed at

			will conduct monitoring activity at approximately 35-45 inland lakes annually.	44 public lakes throughout the state. 2015 Status: Monitoring was completed at 38 public lakes throughout the state.
		Gregg Good	<u>Volunteer Lake Monitoring Program (VLMP)</u> – Illinois EPA will conduct VLMP Tier 1 monitoring at approximately 150-160 inland lakes and Tier 2 monitoring at approximately 40-50 inland lakes annually.	2014 Status: 152 total lakes are being monitored at least at the Tier 1 level. 61 of those lakes are monitored at a Tier 2 level. 2015 Status: 148 total lakes were monitored at least at the Tier 1 level. 71 of those lakes were monitored at the Tier 2 level.
		Gregg Good	<u>Fish Contaminant Monitoring Program</u> – Illinois EPA continues to work cooperatively with the IDNR, IDPH, and IDOA pursuant to the protocols established by Illinois' Fish Consumption Monitoring Program to collect and analyze fish from inland lakes, streams, and Lake Michigan for the purpose of issuing consumption advisories and assessing CWA fish consumption use attainment. The number of samples analyzed through Illinois EPA laboratory will be reported on annually.	2014 Status: The number of fish samples analyzed by Illinois EPA-DOL from October 1, 2013, to June 30, 2014, is 145. From 7/1/14-9/30/14, an additional 117 were analyzed. 2015 Status: The number of fish samples analyzed by Illinois EPA-DOL from October 1, 2014, to September 30, 2015, is 337.
		Gregg Good	<u>Special Surveys</u> – Special surveys are periodically conducted on an as-needed basis to meet lakes, NPS/watershed, permitting, or other program needs. The number and brief summaries of special surveys conducted by the Agency will be reported on an annual basis.	2014 Status: VLMP Tier 3 special survey monitoring was conducted at 14 lakes. 2015 Status: VLMP Tier 3 special survey monitoring was conducted at 4 lakes.
		Gregg Good	<u>Lake Michigan Monitoring Program</u> – Illinois EPA will conduct lake Michigan near shore survey monitoring at 25 probabilistically-based sites on an annual basis. If time and resources allow, 2-3 Lake Michigan harbors, and 3-4 public water supply intake locations, will be monitored annually.	2014 Status: Monitoring was completed at 25 Lake Michigan probabilistic, 3 harbor, and 4 PWS sites by October 15. 2015 Status: Monitoring was completed at 25 Lake Michigan probabilistic, 3 harbor, and 3 PWS sites by October 15, 2015.
		Gregg Good	<u>Wetland Assessments</u> – Upon completion of the Wetland Index of Biotic Integrity (w-IBI) developed	2014 Status: On July 31, 2014, Illinois EPA and Region 5 staff had discussions regarding

			by the Illinois Natural History Survey (INHS), the Illinois EPA agrees to work with Illinois NHS and Region 5 to see how best to incorporate the w-IBI into a methodology to assess attainment of wetland use(s) in the 2016 Section 305(b) report.	<p>next steps. Realizing that even wetland monitoring-rich states like Minnesota and Ohio were not making or reporting individual 305(b)/303(d) related wetland use attainment decisions, it was suggested by Region 5 that Illinois EPA might instead work on a "Statewide Wetland Condition Assessment," something similar but more robust than what is currently documented in Illinois' 2014 Integrated Report, and incorporating the new wetland-IBI tool. Near-term action items were agreed on so discussions between Region 5, INHS, and Illinois EPA would continue.</p> <p>2015 Status: Discussions between Region V, INHS, and Illinois EPA ensued. What resulted was a new "Wetlands Condition Assessment" document written by INHS and accepted by Illinois EPA and Region V. That document has been incorporated into the Agency's draft 2016 Integrated Report.</p>
		Gregg Good	<u>National Aquatic Resource Surveys</u> – Under Joint Funding Agreement with the Illinois-USGS, Illinois EPA will participate in the second year of the National Rivers and Streams Assessment with monitoring to take place in Summer 2014. Illinois EPA will make a commitment by approximately July 2014 whether it will participate in the National Coastal Condition Assessment with monitoring to take place in Summer 2015.	<p>2014 Status: USGS NRSA monitoring is proceeding as planned and was completed by October 2014. Region 5 was informed in March 2014 that the Agency would not participate in the 2015 National Coastal Condition Assessment after learning that the USEPA national site draw allocated no (0) monitoring sites on Illinois' portion of Lake Michigan.</p> <p>2015 Status: Commitment met and reported on above.</p>
		Gregg Good	<u>STORET</u> – Illinois EPA will continue to submit regular updates of water quality information to	2014 Status: We continue to regularly submit as committed.

			STORET via the AWQMS database.	<p>2015 Status: We continue to regularly submit as committed.</p> <p>EPA Response: Based on our evaluation of what data are in STORET, it appears that over the past two years, IEPA has submitted a small percentage of total monitoring data. For 2014 and 2015, there are 2,559 and 0 results, respectively, in STORET. For comparison, IEPA submitted over 150,000 results per year from 2009-2013. What is IEPA's plan to get the remaining 2014 and 2015 data into STORET and to ensure that monitoring data are regularly submitted to STORET moving forward?</p>
		Gregg Good	<p><u>Water Quality Monitoring Strategy Development 2013-2018</u> – In developing the 2013-2018 Illinois Water Monitoring Strategy, consideration will be given to comments provided by USEPA on Illinois EPA's previous strategy; new state and federal priorities; availability of Illinois EPA staff and financial resources; technical capabilities; etc. Region 5 and Illinois EPA will work together to develop a draft of the strategy which will be submitted to USEPA for review and comment by May 30, 2014. USEPA's review comments will be provided back to Illinois EPA by July 31, 2014. The final strategy will be developed by September 30, 2014.</p>	<p>2014 Status: The Agency's draft 2015-2020 Monitoring Strategy was developed and forwarded for internal and Region 5 review on May 30, 2014. Review comments were requested and received by July 31, 2014. Final Monitoring Strategy was delivered to USEPA 10/1/2014.</p> <p>2015 Status: Commitment met and reported on above.</p>
		Gregg Good Roy Smogor	By July 15, 2013, Illinois EPA will have been provided with a final report developed in conjunction with Midwest Biodiversity Institute (MBI) and Region 5 that provides an assessment of the resources necessary to run a Level 4 biological assessment program. By December 31, 2013,	<p>2014 Status: Staff met with Director Bonnett on April 17, 2014 to discuss. Although there is ongoing internal discussion of TALU, this is a commitment with Region 5 that we have not yet met.</p>

			Illinois EPA will inform Region 5 whether it will fully commit to development of a TALU-based monitoring assessment, and implementation program in Illinois. If the Illinois EPA commits to doing so, a plan of action with milestones will be drafted and forwarded to Region 5 by March 31, 2014.	2015 Status: Internal discussion of the potential for a TALU-based program is currently on hold. No TALU commitment was incorporated into the PPA 2016-2017 agreement.
		Gregg Good Amy Walkenbach	Illinois EPA will implement procedural and scheduling changes in 2013 that will result in a submittal of the 2014 305(b) report, including a populated Assessment Database and geo-reference data to Region 5 for approval by April 1, 2014	2014 Status: The 2014 Integrated Report, populated Assessment Database, and geo-reference data was forwarded to Region 5 on March 24, 2014. Work has begun on 2016 IR. 2015 Status: Completed.
	303 (d) List Development	Amy Walkenbach	The final 2014 303(d) List will be submitted to USEPA on by April 1, 2014. The 2016 draft 303(d) List will be provided to Region 5 and the public by May 2015 for review and comment with a hearing in July 2015. The final 2016 303(d) List will be submitted to USEPA by April 1, 2016	2014 Status: The 2014 Integrated Report, populated Assessment Database, and geo-reference data was forwarded to Region 5 on March 24, 2014. Timeline planning for the 2016 Integrated Report has been initiated. 2015 Status: The 2016 Integrated Report has been drafted and will be submitted to USEPA Region 5 for approval by April 1, 2016.
		Amy Walkenbach	Illinois EPA will work with U.S. EPA in FY 2015 to develop a plan that is consistent with EPA's 303(d) Vision. The focus of the plan would be for the State to identify priority waters/watersheds for which TMDLs, alternatives or protection plans will be completed by 2022.	2015 Status: Illinois EPA's Vision document was submitted and accepted by USEPA Region 5, July 2015.
WQ-08b	Number and national percent, of approved TMDLs, that are established by States and approved by USEPA [state TMDLs] on a schedule consistent with national	Amy Walkenbach	<ul style="list-style-type: none"> Continue watershed based TMDLs according to the request for proposal (RFP). Illinois EPA will start at least four new TMDL watershed projects every six months. In FFY15 Illinois EPA will begin TMDLS, funded through 319 funds within the PPG, these watersheds are: Bonpass Creek, Horseshoe 	2014 Status: In 2014 we started 10 new projects, at a minimum, but the number of TMDLs will be similar to 10 projects in the past. <ul style="list-style-type: none"> The FFY15 TMDLs have already been initiated, including 10 ongoing traditional and 5 new watersheds.

	policy.		<p>Lake (Alexander Co.), Galena/Sinsinsawa Rivers, Spring Lake and Little Vermilion (Livingston Co.). Additional watersheds will be added in FFY16.</p> <ul style="list-style-type: none"> • Deliver a schedule to Region 5 by September 15 of each year, of final TMDLs to be submitted for approval by Region 5 in each subsequent FFY. • Illinois EPA will address 70 segment impairments through completed TMDLs. • Provide draft TMDLs to Region 5, 30 days prior to public notice, or alternative timeframe as agreed upon, for review and comment. • Develop implementation plans for all 319 funded TMDLs. 	<p>We await guidance from Region 5 in order to complete new atrazine TMDLs.</p> <ul style="list-style-type: none"> • The schedule was submitted in our annual TMDL report to Region V submitted 9/27/13 (delayed due to edits). • Illinois is currently developing TMDLs on 157 segments. • We have made this our practice unless we have USEPA approval for a short-termed timeframe. • All current projects include this requirement. • 2014 Commitments were met with the approval of Atrazine and Simazine TMDLs • The Illinois EPA Annual 2014 TMDL Progress Report was submitted to USEPA on September 30, 2014. <p>2015 Status:</p> <ul style="list-style-type: none"> • The FY15 TMDLs continue to be developed as traditional TMDLs, these cover 10 watersheds and are identified in "The Vision" document submitted to USEPA Region 5 in July, 2015. • The eight atrazine/simazine TMDL projects were submitted to USEPA Region 5 for approval • The Agency is working on development of our next RFP which will include approximately six watersheds in addition to our long-term Vision watersheds.
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				<ul style="list-style-type: none"> • In lieu of an annual schedule to USEPA the Agency submitted (July 2015) "The Vision" which outlines the schedule of TMDLs to be completed, short-term 2015-2018 and long-term 2015-2022. • Illinois is currently developing TMDLs on 160 segments. • Illinois still continues to offer USEPA Region 5 the opportunity to review TMDLs prior to public notice, unless circumstances dictate otherwise. • Commitments are currently on schedule to be met, per "The Vision" document submittal. • All TMDLs initiated after the recent 319 Guidance Document was released now include watershed based plan specifics. • The FY2015 Annual TMDL report was submitted to USEPA Region 5 in September, 2015.
		Amy Walkenbach	Illinois EPA will address 135 segment impairments through completed TMDLs, new accountability projects, SP-11 delistings and reassigned Cat 5 impairments to Cat 4b and Cat 4c. Any other delistings resulting in impairments being removed from Category 5 will be taken from the universe of TMDLs needed and the proportional annual reduction equivalent to 1/13 of a TMDL, applied to the annual segment-impairment commitment of 125. It is the intent of Illinois EPA to address 75 segment-pollutant combinations through TMDL development.	<p>2014 Status: Two approved.</p> <p>2015 Status: Illinois has 13 TMDLs currently waiting USEPA Region 5 approval.</p>
		Amy Walkenbach	Illinois EPA will work with Region 5 to make TMDL process in Illinois more efficient and to ensure that	<p>2014 Status: Continuing through the visioning process.</p>

			Illinois EPA remains on pace in TMDL development.	2015 Status: Illinois EPA's Vision document was submitted and accepted by USEPA Region 5, July 2015.
	In recognition that TMDLs developed by Illinois EPA are funded primarily with CWA Section 319 funds, TMDLs will be developed consistent with waters identified (either specifically, or by priority watershed) in Illinois EPA's approved Nonpoint Source Management Program Plan (NPSMP).	Amy Walkenbach	TMDLs will either address the nine elements for watershed based plans as described in EPA's Final NPS Program and Grants Guidelines for States and Territories, App. C (April 2013), or be accompanied by separate implementation plans meeting the nine elements, to provide the basis for implementation project funding with CWA Section 319 funds.	2014 Status: This has been implemented as part of our current contracts with vendors. 2015 Status: All TMDLs that are submitted to USEPA that were developed using CWA Section 319 funds will meet the nine minimum elements for a watershed based plan.
	Nonpoint Source Management Program Plan. Illinois EPA last updated its NPSMP in 2001.	Amy Walkenbach	Illinois EPA will work with the Region to complete revisions and submit an approvable revised Plan by Dec. 31, 2013. Illinois EPA will implement the Plan upon approval, and will, on an annual basis, review the approved NPSMP and update as necessary.	2014 Status: Complete, approved September 30, 2013. Reviewed during end of year report September 2014, no updates necessary at this time. 2015 Status: No updates required at this time.
	NPS workplan and 319 grant application.	Amy Walkenbach	Illinois EPA will submit, and Region 5 will review and approve annual NPS workplans consistent with the EPA's Final NPS Program and Grants Guidelines for States and Territories, and will take action to award 319 grants in accordance with the following schedule: [Note, this proposed schedule is slightly different than the one laid out in the 2000 agreement between the Agencies, but reflects current practice. August 1 – State competitive subgrant solicitation closes, evaluation begins November 1 – State NPS draft workplan due to EPA	2014 Status: Implementing on schedule. 2015 Status: Our commitment of submitting a workplan by November 1 annually has not been met due to budget uncertainties.

			<p>including subgrants proposed for funding</p> <p>December 31 – EPA comments on draft workplan to state</p> <p>January 31 – State responds to EPA comments</p> <p>February 28 – State sends full application to EPA</p> <p>April 30, or as funds received from Congress – Grant award</p>	
	Development and implementation of watershed based plans (WBP).	Amy Walkenbach	<p>Annual NPS Program reports required as a condition of 319 grant awards shall, in addition other required items, include lists and schedules of WBPs to be developed and updated in the upcoming FY. Annual Reports shall also identify priority watersheds to be targeted in the request for proposals for NPS implementation projects. (Note: this accomplishment will only be reported in the Annual NPS Program).</p>	<p>2014 Status: Reported on in our March 20, 2014 update to USEPA as well as in the Annual Report, September 2014.</p> <p>Completed.</p> <p>2015 Status: Submitted in March and September 2015, completed.</p>
WQ-14a	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements.	Roger Callaway	<p>Illinois EPA will enter all required NPDES data elements, from the annual reports, submitted by POTW with approved pretreatment programs into ICIS. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are properly entered into ICIS.</p>	<p>2014 Status: Pretreatment Annual Report data elements have been entered.</p> <p>2015 Status: All Pretreatment Annual Report data elements have been timely entered into ICIS.</p>
	Pretreatment standards and requirements.	Roger Callaway Sreedevi Yedavalli Newton Ellens	<p>Twice a year, by March 31 and September 30, Illinois EPA will provide number and percent of SIUs discharging to POTWs with approved pretreatment programs.</p> <p>Region 5 would like to receive copies of the annual reports from POTWs with approved programs.</p> <p>Illinois EPA will commit to incorporating</p>	<p>2014 Status: 2013 numbers provided to USEPA prior to 3/31/2-14. 2014 numbers were provided to USEPA on September 25, 2014.</p> <p>Illinois EPA began incorporating streamlining language in appropriate permits beginning August 2014.</p>

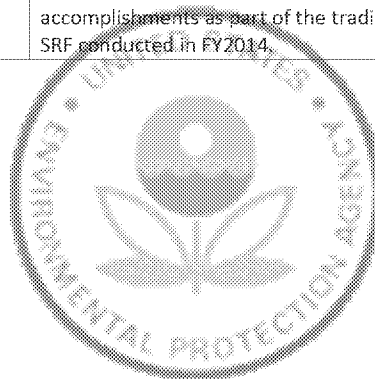
		<p>streamlining language in POTW permits with approved pretreatment programs requiring them to modify their SUOs to incorporate required streamlining requirements.</p> <p>Illinois EPA will commit to incorporating permit language in major POTW permits without approved pretreatment programs to submit data on the industries from which the POTW is receiving process wastewater.</p>	<p>2015 Status: For facilities requiring annual report submission before March 31, 2015, all pretreatment numbers were provided. Numbers for additional annual reports due after March 31, 2015 were provided to USEPA prior to September 30, 2015. All annual reports have been submitted to USEPA. Incorporating streamlining language and permit language in major POTW permits without pretreatment programs remains ongoing.</p>
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	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year.	Roger Callaway	Maintain major quarterly compliance rate at >=95%. Annual rate will meet or exceed the national goal.	<p>2014 Status: We are required to maintain a compliance rate >95%. Second quarter QNCR compliance rate is 95.2%. Annual Rate is 95.6%.</p> <p>2015 Status: Fourth quarter QNCR compliance rate is 95.6% Annual Rate>95%.</p>
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	<p>2014 Status: Second quarter QNCR was prepared and reported to USEPA on June 6, 2014. 12/13/14 QNCR prepared and ready for USEPA to retrieve.</p> <p>2015 Status: All QNCR reports have been timely. Fourth quarter QNCR prepared and ready for USEPA to retrieve.</p>
		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	<p>2014 Status: ANCR was prepared and reported to USEPA on June 27, 2014.</p> <p>2015 Status: ANCR was prepared and retrieved by USEPA in a timely manner.</p>
	Joint Enforcement actions against SNC facilities	Roger Callaway	U.S. EPA and Illinois EPA will share joint responsibility in taking enforcement actions against ten (10) SNC facilities. Illinois EPA will prepare the enforcement package for U.S. EPA. U.S. EPA will in turn initiate the enforcement action by issuing the AOs. Illinois EPA will provide technical assistance to USEPA with respect to remedies proposed by the SNC facility. USEPA will issue and track the AOs, track compliance with schedule milestones and terminate order upon completion of compliance requirements.	<p>2014 Status: A total of 10 AO's have been sent to USEPA between March 2014 and October 30, 2014.</p> <p>2015 Status: Ten AO's have been sent to USEPA between October 1, 2014 and September 30, 2015.</p>
Clean Water Action Plan	Resolve State Review Framework items	Bud Bridgewater	By October 31, 2013, Illinois EPA will provide USEPA a draft final Field Procedures Manual for review. The manual will outline the steps for the completion of inspection reports which include	2014 Status: Completed. Field Procedures Manual submitted October 1, 2013 RE: The FFY2014 Inspection Plan, submitted October 1, 2013 and approved by USEPA on January 2,

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			<p>appropriate guidelines, procedures, and oversight. The Illinois EPA will follow the national Compliance Monitoring Strategy (CMS) for inspections and will meet the commitments as resources allow.</p>	<p>2014. Inspection goals established in the plan were met or exceeded.</p> <p>2015 Status: Completed. The FFY2015 Inspection Plan submitted September 10, 2014 and approved by USEPA on January 21, 2015. Inspection goals established in the Plan were consistent with CMS targets.</p> <p>EPA Response: IEPA could have highlighted the additional actions that were accomplishments as part of the traditional SRF conducted in FY2014.</p>
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	EPA/State permitting and enforcement joint work plan	Sanjay Sofat	U.S. EPA's and Illinois EPA's joint permitting and enforcement work plan elements have been included in the PPA, as put forwarded in U.S. EPA's CWA Action Plan. Illinois EPA and U.S. EPA will implement the work plan to achieve the desired outcome consistent with the timeframes specified. Illinois EPA and U.S. EPA will re-examine the work plan at regular intervals and make changes, if necessary.	<p>2014 Status: Illinois EPA & USEPA are following the Work Plan as written. So far no need to propose any changes to the Work Plan.</p> <p>2015 Status: Illinois EPA & USEPA are following the Work Plan as written.</p>
Clean Water Acton Plan	Address Minor "Serious" Violators	Roger Callaway	Review non-compliance reports in response to significant violations. Select appropriate Enforcement Response	<p>2014 Status: Non-compliance reports were reviewed for SNC. Appropriate enforcement response taken. As of September 30, 2014, a total of 180 Violation Notices have been sent.</p> <p>2015 Status: Non-compliance reports continue to be reviewed for SNC/Category 1 Violations. Both formal enforcement - (VNs) and informal enforcement - (NCAs and Internal Compliance Assistance) were utilized to return facilities to compliance and resolve the SNC violations.</p> <p>EPA Response: In an effort to clarify the statement above. VNs are not formal enforcement as stated. In future reports do not represent VNs as formal enforcement. CCAs and judicial orders are indicators of formal enforcement.</p>
		Roger Callaway Bud Bridgewater	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations.	<p>2014 Status: Appropriate compliance/enforcement action taken for NPDES, SSO, CSO and CAFO violations. Violation notices issued: NPDES = 129; SSO = 47; CAFO = 4; CSO = 0; Other = 27 as of September 30, 2014.</p>

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				<p>2015 Status: Appropriate compliance/enforcement action taken for NPDES, SSO, CSO and CAFO violations. Violation notices issued: NPDES = 163; SSO = 42; CAFO = 12; CSO = 0; Other = 33 as of September 30, 2015.</p>
		Roger Callaway	<p>At U.S. EPA's request participate in additional discussion with Region 5 to successfully complete EPA's Municipal Infrastructure National Enforcement Initiative focusing on reducing discharges from CSOs and SSOs, keeping raw sewage and contaminated stormwater out of our nation's waters. To address this, U.S. EPA and Illinois EPA will discuss and investigate Sanitary Sewer Systems (SSSs) with total treatment capacity greater than or equal to 10 MGD and Combined Sewer Systems (CSSs) communities serving population greater than equal to 50,000 that continue to have wet weather compliance issues, to determine the appropriate action, if necessary.</p>	<p>2014 Status: To date USEPA has not requested us to participate in further discussions on the Municipal Infrastructure National Enforcement Initiative regarding CSOs and SSOs. All questions regarding specific SSOs and CSO have been answered.</p> <p>2015 Status: To date USEPA has not requested us to participate in further discussions on the Municipal Infrastructure National Enforcement Initiative regarding CSOs and SSOs. All questions regarding specific SSOs and CSO have been answered.</p>
		Roger Callaway	<p>Review and update "Watch Lists" on a quarterly basis</p>	<p>2014 Status: Watch List not being prepared by USEPA. According to USEPA, Watch List may no longer be a tracked metric.</p> <p>2015 Status: Watch List not being prepared by USEPA. According to USEPA, Watch List may no longer be a tracked metric.</p>
		Roger Callaway	<p>Single event violation (SEVs) entry will be performed along with the entry of major inspections.</p>	<p>2014 Status: SEVs and major inspections are being entered into ICIS.</p> <p>2015 Status: SEVs and major inspections are being entered into ICIS.</p>
		Roger Callaway	<p>CSO notifications from municipalities will be entered into ICIS. An approach to tracking SSO notifications will be identified as part of the CSOs strategy that Illinois EPA proposed.</p>	<p>2014 Status: Those with NPDES permits are entered into ICIS, others are entered into a data base maintained by CAS.</p>

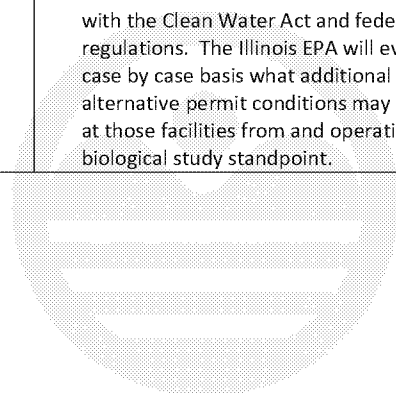
				<p>2015 Status: Those with NPDES permits are entered into ICIS; others are entered into a data base maintained by CAS. SSO event reports are being entered into ICIS for NPDES permitted facilities. A separate database is being maintained by CAS for SSO events that occur in unpermitted collection systems.</p>
		Roger Callaway	<p>Illinois EPA will expand the use of electronic reporting to include additional facilities as well as additional types of reports received from wastewater facilities.</p>	<p>2014 Status: Currently 1,974 NPDES Permits that are required to submit DMRs have requested access and are at various states of using NetDMR. Follow-up is ongoing for the remaining permits. Electronic submission of all special conditions in NPDES permits is in development.</p> <p>2015 Status: Currently, 94% of Illinois/ NPDES Individual and General Permits that are required to submit DMRs are utilizing NetDMR to submit their monthly DMRs electronically. On December 21, 2015, the Federal NPDES Electronic Reporting rule will become effective, requiring the remaining 6% to either report electronically utilizing NetDMR or obtain a waiver. Individual assistance is being provided to permittees as they make the transition. Further, IEPA is researching and plans to develop an electronic reporting tool to enable electronic submission of all Phase II of the E-Reporting Rule reporting requirements.</p>
		Bud Bridgewater	<p>Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.</p>	<p>2014 Status: On-going. Consistently providing timely feedback to Region 5 on all complaints that USEPA has forwarded.</p> <p>2015 Status: On-going. Consistently providing timely feedback to Region 5 on all</p>

	Permit Activities	Al Keller	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY14/15.	complaints that USEPA has forwarded. 2014 Status: The Illinois EPA submitted the list on October 3, 2014. 2015 Status: The Illinois EPA submitted the lists of major (90), minor (139) and non-stormwater general permit coverage letters (117) issued on October 2, 2015 and the terminated permit list (45) on October 13, 2015.
WQ-12a		Al Keller	The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Illinois EPA has been working with several local watershed stakeholders to develop watershed-specific nutrient limits based on Illinois' narrative water quality standard. A process to develop watershed-specific nutrient limits is cumbersome. Illinois EPA will need additional time to develop a nutrient permit limit that is supported by local watershed stakeholders. Because of issues raised on nutrient limits based on the Illinois narrative standard, the number of industrial NPDES permits going to public hearings, and ongoing work to resolve and implement solutions to thermal permitting issues, Illinois EPA commits that 80-85% of majors will be current and 85% of minors will be current. Illinois EPA and Region 5 commit to continuing to identify and implement approaches on nutrient limits based on narrative standard; EPA meeting its goal of reviewing selected proposed permits within 30 days. Agreement to implementing an approach to nutrient limits, continuing to resolve thermal permit issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current	2014 Status: Illinois EPA and USEPA have monthly conference calls to discuss any specific permit issues and also report the present backlog. The present backlog is 93% minor permits current, 66% major permits current and 100% priority permits issued. The Agency has maintained the 90% minor backlog goal each month this fiscal year and met this goal at the end of this fiscal year also. The Agency has been in discussion with USEPA on finalizing the Fox River major permits standard language and has also been discussing proper monitoring protocol for facilities with excess flows that are blended with full treatment effluent. General template language is also being discussed for all individual municipal permits and is being incorporated into present permits. The Agency has forwarded special condition language to USEPA for the DuPage River major permits for permittees that participate in that workgroup, also. Once approved by USEPA the Agency will include the workgroup language in the draft permits. Major permits in the DesPlaines River have been drafted to include phosphorus limits. All power plant

			<p>and 90% of minor permits will be current.”</p> <p>Illinois EPA will commit to a higher percentage of minor permits current.</p>	<p>permits are currently being reviewed for final issuance, preparing responsiveness summaries or being drafted for public notice. The Agency has been in discussion with USEPA concerning 316b issues due to recent federal regulations and will be including approved language in all permits.</p> <p>2015 Status: Illinois EPA and USEPA continue to have monthly conference calls to discuss specific permits, various permit issues and report on the current backlog. At the end of FFY15, September 30, 2015, 96.5% of minors were current and 91.1% of majors were current. The Agency and USEPA had previously finalized the Fox River Workgroup nutrient special condition and the Agency issued 20 out of 20 major permits in this watershed. The Agency and USEPA also finalized the DuPage River/Salt Creek Workgroup nutrient special conditions and the Agency issued 13 out of 20 major permits for facilities participating in that workgroup. The Agency also issued 11 of the 16 major permits in the DesPlaines River watershed with appropriate nutrient limits. Other major municipal permits were issued in accordance with work items schedules for the staff. All power plant permits were drafted, public noticed and issued in accordance with recent 316a and b regulations and guidance from USEPA.</p>
		Darin LeCrone	<p>Review of NPDES permits for power plants with thermal discharges.</p> <p>1. Continue to review existing NPDES permit conditions at electric generating facilities for</p>	<p>2014 Status: Two power plant permits were issued on the last day of FFY14 which incorporated the procedures identified with respect to thermal and 316(b) conditions. Following the October 2014 effective date of</p>

			<p>determination of compliance points and include where necessary proper conditions to limit flow and temperature or to measure compliance or model compliance with applicable standards for each permit renewal.</p> <ol style="list-style-type: none"> 2. Require mixing zone studies where necessary to ensure a measurable compliance point with applicable thermal standards. 3. Renewed permits will specify a heat rejection rate where appropriate, to ensure compliance with any applicable anti-degradation requirements. 4. Identify permits with 316(a) relief that are expiring in the next 2 to 4 years and notify those facilities that they must submit, with their permit renewal application, updated justification that relief meets 40 CFR 125.72 and demonstrates that any alternative limit protects a balanced and indigenous population. 5. For renewed NPDES permits, the permit record will provide the assumptions used to demonstrate that thermal standards will not be exceeded. <p>Review of thermal relief for power plant discharges as NPDES permits are renewed.</p> <ol style="list-style-type: none"> 1. If the relief is clearly through a 316(a) demonstration, those with pending renewals of permits will get a permit condition to submit updated 316(a) demonstration information during the permit cycle. Permit conditions will be included for studies to be conducted to re-justify existing 316(a) relief that address both the nature of the studies to be conducted or submitted, and the time frame for conducting the studies and submitting results. Submitted 	<p>the new Cooling Water Intake Structures Existing Facilities Rule, 316(b) language was again revised with input from Region 5, to incorporate the requirements of the new rule. Two permits with thermal relief conditions are in the final stage of issuance following Region 5 review, and four others are in the notice process with conditions developed in accordance with the agreed upon procedures for addressing thermal relief.</p> <p>2015 Status: Eight power plant permits were issued in FFY 2015. All of these were issued in accordance with the agreed upon procedures for thermal/temperature and 316(b). Two more are off public notice, and are in the final steps of issuance, in accordance with these procedures.</p>
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			<p>results will meet 40 CFR125.72 and demonstrate that any alternative limitation protects a balanced and indigenous population.</p> <p>2. For permits with no-316(a) relief, Illinois EPA will review the Board opinion/records to evaluate whether the assumptions on which the relief was granted are still accurate and valid. USEPA will provide, as appropriate, its determination regarding the consistency of the relevant Illinois Pollution Control Board orders with the Clean Water Act and federal regulations. The Illinois EPA will evaluate on a case by case basis what additional or alternative permit conditions may be necessary at those facilities from an operational or biological study standpoint.</p>	
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WQ-13a		Al Keller	<p>Stormwater – Illinois EPA has reissued the construction site activity general permit. Illinois EPA will reissue the industrial site and MS4 stormwater general permits upon expiration of these permits. Illinois EPA will monitor any new federal regulations concerning these permits (i.e., effluent guidelines for construction site activities, new MS4 requirements, flow rate related restrictions) and modify the permits as necessary.</p>	<p>2014 Status: The Agency has public noticed a draft MS4 general permit and has received numerous comments from MS4 communities and consultants about additional requirements which will necessitate additional resources, time and cost. The Agency is reviewing all comments and will advise USEPA of any modifications to the draft permit prior to final issuance. The Agency has prepared a draft industrial site activity stormwater general permit and has obtained additional stakeholder input prior to another submission to USEPA and public notice.</p> <p>2015 Status: The Agency has completed the review of all comments on the draft MS4 general permit. The Agency has revised the new monitoring requirements in the draft MS4 permit and has consensus with USEPA on a modified approach with monitoring. The Agency will be providing the modified language to various stakeholders and commenters of the draft permit. The Agency will also advise USEPA of the final modifications to the draft permit prior to final issuance. The Agency has worked with USEPA on the draft industrial site stormwater general permit. The Agency has also received comments from numerous stakeholders prior to placing the permit on formal public notice. The draft permit is expected to be placed on public notice late 2015 to early 2016.</p>
WQ-19a	Number of high priority state NPDES permits that are issued in the fiscal year.	Darin LeCrone	<p>Develop new priority permit lists for FFY2014 and 2015 in conjunction with Region 5 as soon as practicable near the end of each federal fiscal year for the upcoming year. Issue 100% of the identified priority permits by the end of each FFY.</p>	<p>2014 Status: USEPA allowed revisions to FFY2014 priority permit list were made and submitted to Region 5 in May 2014. Illinois EPA issued 100% of identified priority permits. The final list was submitted on October 2, 2014.</p> <p>2015 Status: Illinois EPA issued 100% of FFY2015 Priority Permits. IEPA worked with Region 5 following the end of FFY 2015 to develop the new priority permit list for FFY 2016. The FFY 2016 list was approved by Region 5 and sent to IEPA on October 29, 2015.</p>
		Darin LeCrone	<p>Permit Backlog List – Illinois EPA will submit a list of major or general permits, expired and expiring, for</p>	<p>2014 Status: List of permits expected to be issued by end of FFY14 (September 30) submitted to Region 5 on August 13, 2014.</p>

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			reissuance by August 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	2015 Status: IEPA worked with Region 5 to develop list of majors and general permits to be re-issued following end of FFY2015. Final list was approved by Region 5 and received via e-mail on November 30, 2015.
		Al Keller Patrick Kuefler	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice. Upon completion of public notice, Illinois EPA will provide Region 5 for review the proposed permit and Illinois EPA's response to comments.	2014 Status: This is an ongoing activity. The Illinois EPA has been following the agreed upon approach mentioned in the commitment. 2015 Status: This is an ongoing activity. The Agency and USEPA were in constant contact with each other concerning individual permit reviews. Due to previous reviews of template language and joint approval of special conditions with 2 major watershed groups covering numerous permits, the Agency was able to achieve the 90% current major permit goal.
		Al Keller	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility which includes an expansion of a facility.	2014 Status: This is an ongoing activity. The Illinois EPA has been following the agreed upon approach mentioned in the commitment. 2015 Status: This is an ongoing activity.
		Al Keller	Finalize and propose Sludge Regulations adoption during FFY14.	2014 Status: Was not completed by September 30, 2014. We continue with internal processing and plan additional stakeholder outreach. 2015 Status: Due to other more urgent regulation development projects, this task was given a low priority and not completed. The Agency has not received 504 sludge program delegation and does not plan to request such delegation in the next 2 year period.

				EPA Response: It should be 503 instead of 504.
		Al Keller	Continue to implement the nutrient permitting strategy in permit issuances and reissuances during FFY14, pursuant to Illinois EPA's 11/2/2011 letter to U.S. EPA.	<p>2014 Status: This is an ongoing activity. Illinois EPA has been following the nutrient permitting approach outlined in Illinois EPA's 11/2/2011 letter to USEPA.</p> <p>2015 Status: This is an ongoing activity. The Agency continues to issue major permits pursuant to the 11/2/11 letter and the Illinois Nutrient Loss Reduction Strategy 2015. The Agency prioritized permit drafting and issuance by permittees in watershed groups specified in the letter and incorporated conditions in permits as agreed to jointly by IEPA and USEPA, as well as the permittees.</p>
Clean Water Action Plan - Permitting for Environmental Results	Extend scope of current permits to ensure WET testing requirements	Bob Mosher	Determine protocol for deciding when more monitoring or limits is necessary for chronic WET by March 15, 2012.	<p>2014 Status: Whole Effluent Toxicity. We were asked to develop chronic WET protocols for testing and establishing permit limits. We prepared drafts for Region 5 approval and submitted to them. Region 5 review is ongoing.</p> <p>2015 Status: Chronic WET protocols for Illinois have been discussed with Region 5. IEPA has finalized the chronic WET guidance document and NPDES permitting language and is awaiting final approval from Region 5.</p>
	Confined Animal Feeding Operation (CAFO) Work Plan	Dan Heacock	<u>CAFO Rulemaking</u> - Refer to attached CAFO Work Plan February 4, 2013.	<p>2014 Status: The Illinois Pollution Control Board issued the final CAFO rule on August 7, 2014 and it became effective August 11, 2014.</p> <p>2015 Status: Completed. The Agency submitted the final CAFO rule amendment on October 3, 2014 to USEPA.</p>
		Bud Bridgewater	<u>CAFO Inventory and Inventory Updates</u> - Refer to attached CAFO Work Plan February 4, 2013.	<p>2014 Status: Completed. CAFO Inventory with identified Large CAFOs and other permitted CAFOS submitted on October 28, 2013.</p> <p>2015 Status: On-going. The updated Large CAFO Inventory was submitted per the Calendar Years 2014-2016 Illinois Program Work Plan.</p>
		Bud Bridgewater	<u>CAFO Inventory and Inventory Updates</u> - Refer to attached CAFO Work Plan February 4, 2013.	<p>2014 Status: On-going. SOP for "CAFO Inventory Updates" developed in September 2013 with a copy submitted to USEPA on December 11, 2013. Per CAFO Workplan, the amended CAFO Inventory submitted on November 24, 2014.</p>

				<p>2015 Status: On-going. The updated Large CAFO Inventory was submitted per the Calendar Years 2014-2016 Illinois Program Work Plan.</p>
		Bud Bridgewater	<p><u>CAFO Work Load Assessment</u> - Maintain the appropriate level of FTEs to support and manage the CAFO program. Refer to attached CAFO Work Plan February 4, 2013.</p>	<p>2014 Status: Assessment submitted December 9, 2013. For DWPC/FOS, the Assessment sought the hire of two (2) field staff, one each in Peoria and Rockford. Peoria – internal transfer on August 18, 2014. Rockford – position posted, but no bidders and no applicants on Illinois’ Central Management Services (CMS) candidate list. As result, Illinois EPA has contacted colleges and universities in an effort to solicit candidate applications to CMS. Awaiting recall of a new CMS list.</p> <p>2015 Status: Completed. The DWPC/FOS staffing needs that were summarized in the December 2013 Assessment is still valid.</p>
		Dan Heacock	<p><u>CAFO permit reviews</u> - Refer to attached CAFO Work Plan September 5, 2014. Review and issue CAFO permits in accordance with March 18, 2013 CAFO NPDES Permits SOP.</p>	<p>2014 Status: Projects have been reviewed according to the SOP by review of applications and issuance of NOIs, Public Notices and Permits. Most projects have met timelines in the SOP for issuance of NOIs. Several projects have not met timelines in the SOP for issuance of NOIs and Public Notices. Reasons for this include resignation of a staff from program in December 2013, transition of projects to remaining staff. The Agency has hired two staff to work on CAFO permits. Going forward, the Agency anticipates to timely review and issue CAFO permits in accordance with March 18, 2013 CAFO NPDES permits SOP. The general permit expired in September 2014. The Pollution Control Board adopted new regulations in August 2014. The NMPs on projects under review need revision to meet the new regulations and coverage under a new permit, therefore additional review and new NOIs need to be issued for these projects.</p> <p>2015 Status: Projects have been reviewed according to the SOP by review of applications and issuance of NOIs, Public Notices and Permits. Most projects have met timelines in the SOP for issuance of NOIs. Several projects have not met timelines in the SOP for issuance of NOIs and Public Notices. Going forward, the Agency</p>

				anticipates to timely review and issue CAFO permits in accordance with March 18, 2013 CAFO NPDES permits SOP.
		Dan Heacock	<p><u>Incomplete CAFO Permit applications</u> - Refer to attached CAFO Work Plan September 5, 2014 and take actions in conformance with March 18, 2013 CAFO NPDES Permits SOP.</p>	<p>2014 Status: Applicants have not completed applications after one or two NOIs issued or do not provide timely responses within 30 days of the NOI letter. Reasons from applicants for less than timely responses include time needed for soil tests, land acquisition, and development of construction plans. The general permit expired in September 2014. The Pollution Control Board adopted new regulations in August 2014. The NMPs on projects under review need revision to meet the new regulations and coverage under a new permit, therefore additional review and new NOIs need to be issued for these projects. In cases where USEPA has issued an administrative order or taken enforcement action regarding the CAFO Illinois EPA has conferred with and referred facilities to USEPA for compliance or enforcement action in accordance with the SOP. If Illinois EPA issues a violation notice we will need to determine if the permit is still required which may require a new field inspection of the site. USEPA depends on Illinois EPA to determine if a permit is still required in cases where USEPA has required the permit application based on USEPA inspections and referral has been made to USEPA after inadequate response to Illinois EPA NOIs.</p> <p>2015 Status: Applicants have not completed applications after one or two NOIs issued or do not provide timely responses within 30 days of the NOI letter. Reasons from applicants for less than timely responses include: time needed for soil tests; land acquisition; and development of construction plans.</p> <p>The issue of incomplete application is further complicated by the newly adopted CAFO rule. The Pollution Control Board adopted new regulations in August 2014. The NMPs on projects under review need revision to meet the new regulations and coverage under a new permit, therefore additional review and new NOIs need to be issued for these projects.</p> <p>Other reasons for delay are:</p> <ul style="list-style-type: none"> • <p>In</p>

				<p>cases where USEPA has issued an administrative order or taken enforcement action regarding the CAFO, Illinois EPA has conferred with and referred facilities to USEPA for compliance or enforcement action in accordance with the SOP.</p> <ul style="list-style-type: none"> • If Illinois EPA issues a violation notice we will need to determine if the permit is still required which may require a new field inspection of the site. <p>USEPA depends on Illinois EPA to determine if a permit is still required in cases where USEPA has required the permit application based on USEPA inspections and referral has been made to USEPA after inadequate response to Illinois EPA NOIs.</p>
			<p><u>CAFO Permit Application Tracking</u> – Submit CAFO tracker by 27th of every even numbered month.</p>	<p>2014 Status: The Illinois EPA has submitted CAFO tracker to USEPA on October 25, 2013, December 26, 2013, February 27, 2014, May 1, 2014, June 27, 2014, August 27, 2014 & October 27, 2014.</p> <p>2015 Status: The Illinois EPA has submitted CAFO Tracker on October 27, 2014, December 29, 2014, February 27, 2015, April 27, 2015, June 29, 2015 and October 9, 2015.</p>
		Dan Heacock	<p><u>Inform CAFOs of amended CAFO rule and permit requirements</u> - Refer to attached CAFO Work Plan February 4, 2013.</p>	<p>2014 Status: The Illinois Pollution Control Board issued the final CAFO rule on August 7, 2014. The effective date of the rule is August 11, 2014, published in the Illinois Register on August 22, 2014.</p> <p>2015 Status: Completed. The Illinois EPA sent a letter to Large CAFOs on November 18, 2014 regarding the amended CAFO rule and permit requirements.</p>

			<p><u>Revise permit application</u> - Refer to attached CAFO Work Plan February 4, 2013.</p>	<p>2014 Status: The Illinois Pollution Control Board issued the final CAFO rule on August 7, 2014. The effective date of the rule is August 22, 2014, published in the Illinois Register on August 22, 2014. The Agency is not expecting to make changes to the permit application forms and will continue to use the existing federal application forms 1 and 2B.</p> <p>2015 Status: The Illinois Pollution Control Board issued the final CAFO rule on August 7, 2014. The effective date of the rule is August 22, 2014, published in the Illinois Register on August 22, 2014. The Agency is not expecting to make changes to the permit application forms and will continue to use the existing federal application forms 1 and 2B.</p>
			<p><u>Propose general permit revisions</u> - Refer to attached CAFO Work Plan February 4, 2013.</p>	<p>2014 Status: The Illinois Pollution Control Board issued the final CAFO rule on August 7, 2014. The final CAFO rule became effective on August 11, 2014, published in the Illinois Register on August 22, 2014. The Agency has commenced reviewing the rule for changes to be made to the CAFO general permit.</p> <p>2015 Status: Completed. The draft general permit was provided to USEPA on May 22, 2015.</p>
		Roger Callaway Bud Bridgewater	<p>Illinois EPA will enter and maintain medium and large permitted CAFOs in ICIS. USEPA will enter the remaining CAFO inventory once it is received from Illinois EPA into ICIS as a one-time support effort. Regarding the long-term maintenance of the CAFO inventory, Illinois EPA staff will maintain the CAFO inventory of permitted and unpermitted CAFOs</p>	<p>2014 Status: Completed. In September 2013, SOP was developed for updating the CAFO Inventory Database and then revised July 2014. DWPC/FOS has developed a comprehensive inspection strategy for AFO/CAFO program that in part, addresses CAFO Inventory long-term maintenance in</p>

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			<p>through an internal Illinois EPA database. Illinois EPA will provide regular updates (semi-annual) to U.S. EPA of the inventory via its internal database system. Illinois EPA will also look into the possibility of providing updates in the form of changes to the inventory, which may reduce the level of effort required to enter and maintain inventory data. What needs to be resolved is the long-term maintenance of the non-permitted CAFO inventory in ICIS. By the end of FY13 the agencies will assess the workload associated with updating the non-permitted CAFO inventory in ICIS and develop a plan for the long-term maintenance of the CAFO inventory beginning in FY14</p>	<p>response to 2014 – 2016 Work plan, and submitted it to USEPA on October 13, 2014. The Work plan also requires the updated Large CAFO Inventory Database by August 31 and February 28 each year to demonstrate that we routinely update the CAFO Inventory per the SOP, the updated Inventory was submitted to USEPA on November 19, 2014. The DWPC/FOS staffing needs that were summarized in the December 2013 Assessment are still valid.</p> <p>2015 Status: On-going. The updated Large CAFO Inventory and the Bi-Monthly CAFO Enforcement Actions Summary Reports were submitted per the Calendar Years 2014-2016 Illinois Program Work Plan.</p> <p>The DWPC/FOS staffing needs that were summarized in the December 2013 Assessment are still valid.</p> <p>EPA Response: EPA could not verify all permitted CAFO inspections as reported. Consequently, EPA should develop a plan to verify inspections numbers in ICIS with the end of year CMS report.</p>
		Bud Bridgewater	<p>CAFO NPDES annual inspection plan, number of evaluations to be conducted, and enforcement actions and escalation - Refer to attached CAFO Work Plan February 4, 2013.</p>	<p>2014 Status: Completed. FFY 2014 Inspection Plan submitted October 1, 2013 and approved by USEPA on January 2, 2014.</p> <p>2015 Status: Completed. The CAFO Inspection Plan was incorporated into the FFY2015 Inspection Plan that was submitted on September 10, 2015 and approved by USEPA on January 21, 2015.</p>
		Bud Bridgewater	<p>CAFO – Site Specific Inspection Plan - Refer to</p>	<p>2014 Status: Completed. The CAFO</p>

			attached CAFO Work Plan February 4, 2013	<p>Inspection Plan was incorporated into the FFY2014 Inspection Plan that was submitted on October 1, 2013 and approved by USEPA on January 2, 2014.</p> <p>2015 Status: Completed. The CAFO Inspection Plan was incorporated into the FFY2015 Inspection Plan that was submitted on September 10, 2015 and approved by USEPA on January 21, 2015.</p>
		Bud Bridgewater	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum within six months of their start date, and prior to conducting inspections independently	<p>2014 Status: New Peoria Regional Office staff is progressing through the training curriculum within 6 months of start date (August 18, 2014).</p> <p>2015 Status: Completed.</p>
		Bud Bridgewater	All staff working on AFO/CAFO issues will be trained on the revised ERG.	<p>2014 Status: Completed.</p> <p>2015 Status: Completed.</p>
		Roger Callaway	Issue VNs for noncompliance at CAFOs - Refer to attached CAFO Work Plan February 4, 2013	<p>2014 Status: 4 VNs for CAFO non-compliance were issued.</p> <p>2015 Status: 12 VNs for CAFO non-compliance were issued.</p>

		Roger Callaway	CCA Case Referrals to AG's Office - Refer to attached CAFO Work Plan February 4, 2013	<p>2014 Status: Violations of CCAs will be referred to AGs office.</p> <p>2015 Status: One CAFO facility was referred to the AG's office for a violation of a CCA.</p> <p>EPA Response: EPA has other information that suggests that it could have been 1 to 3 referrals. If appropriate, IEPA should reassess and revise this statement to reflect the correct number.</p>
		Roger Callaway	CAFOs not responding to VN - Refer to attached CAFO Work Plan February 4, 2013	<p>2014 Status: All CAFOs have responded to VNs.</p> <p>2015 Status: Two CAFOs failed to respond to VNs; additional enforcement action is being pursued.</p>
		Bud Bridgewater Chuck Gunnarson Roger Callaway	Quarterly Docket Review of CAFO Referrals - Refer to attached CAFO Work Plan February 4, 2013	<p>2014 Status: On-going. Each quarter, DLC, DWPC/CAS and DWPC/FOS along with the IAGO participate in the USEPA conference call for status updates on the CAFO Referrals.</p> <p>2015 Status: USEPA scheduled no "Quarterly Docket Review" conference calls in FFY2015.</p> <p>Providing timely feedback on USEPA inquiries on any CAFO Referrals.</p>
	Supplemental Section 106 Funding workplan	Bud Bridgewater	New hires for CAFO Inspections - Refer to attached CAFO Work Plan February 4, 2013	<p>2014 Status: The report on the FY 10 Supplement Section 106 Supplemental Grant, EIN #01-0572642, was submitted in June 2013. Regarding "new hires", refer to response to "Clean Water Action Plan", Page 20, <u>CAFO Work Load Assessment</u> above.</p> <p>2015 Status: Completed.</p>

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	Inspections	Bud Bridgewater	<p><u>Inspection strategy</u> – An inspection plan, by category, will be sent to Region 5 by September 30 and will include projections for each year and consistency with EPA's National Compliance Monitoring Strategy (CMS). Region 5 will comment on the Illinois EPA plan 30 days after submittal.</p>	<p>2014 Status: Submitted October 1, 2013 and approved by USEPA on January 2, 2014. FFY15 plan was submitted September 10, 2014 – awaiting USEPA approval.</p> <p>2015 Status: FFY2015 Inspection Plan submitted September 10, 2014 and approved by USEPA on January 21, 2015. Inspection goals established in the Plan were consistent with the CMS targets.</p> <p>EPA Response: EPA should have provided some detail as to why they fell short in two of 11 CMS commitments.</p>
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		Bud Bridgewater	<p><u>Frequency of inspecting majors</u> – Majors with good compliance history will be reduced. A specific list and schedule of majors to be inspected will be sent to Region 5 by September 30th of each year.</p>	<p>2014 Status: Submitted October 1, 2013 and approved by USEPA on January 2, 2014. FFY15 list was submitted September 10, 2014 – awaiting USEPA approval.</p> <p>2015 Status: FFY2015 Inspection Plan (included Majors) submitted September 10, 2014 and approved by USEPA on January 21, 2015.</p>
		Bud Bridgewater	<p><u>Reconnaissance inspections</u> – Recon inspections will continue, as resources allow.</p>	<p>2014 Status: On-going. Retirement of Marion Regional Office sampler will reduce the number FFY 2014 inspections in comparison to prior years. DWPC/FOS conducted 1035 technician reconnaissance inspections in FFY2014.</p> <p>2015 Status: On-going. Though a reduction from prior years due to staff retirement, DWPC/FOS conducted 935 RWS/ROS inspections in FFY2015.</p>
		Bud Bridgewater	<p><u>Stormwater inspections in conjunction with SWCDs</u> - Agreements are in place with the SWCDs. These agreements govern to operations of this inspection and technical assistance program.</p>	<p>2014 Status: Contracts with designated Soil & Water Conservation Districts (SWCDs) were reissued July 10, 2014, and the inspections (Illinois EPA and SWCD) to date exceed the PPA commitments. In response, we have re-focused Illinois EPA staff on other PPA commitments.</p> <p>2015 Status: SWCDs under contract continue to perform construction site stormwater inspections though construction slow down coupled with SWCD staff reductions due to on-going State budget issues have resulted in a decrease of the number of inspections from the norm. Despite these reductions, the IEPA</p>

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				inspection program continues to focus on the areas with the higher number of construction projects.
		Bob Mosher	Illinois EPA will continue to implement the elements of the nutrient plan.	<p>2014 Status: We continue to follow the annually updated Nutrient Plan.</p> <p>2015 Status: We continue to follow the annually updated Nutrient Plan.</p> <p>EPA Response: IEPA's current nutrient criteria plan contemplated proposal of numeric criteria for streams with natural watersheds (low-P waters) by December 2015 and adoption by December 2017. EPA would like an update on the status of criteria development for low-P waters.</p>

Joint Priority	Promote the use of anaerobic digesters in Illinois	Marcia Willhite	Anaerobic digesters are used to break down organic wastes and convert them into heat and methane gas, which can then be used to produce electricity. Digesters can be used to manage agricultural wastes to address problems with waste lagoons, impaired water quality, particulate matter, odors, pests and carbon dioxide, while producing renewable energy, and if placed on a brownfield or other contaminated property, can contribute to reuse and redevelopment of such properties. Illinois EPA and EPA agree to work together to promote the increased use of anaerobic digesters through data sharing, outreach to stakeholders, and prioritization of permits and other regulatory approvals for digester projects.	<p>2014 Status: A feasibility study was completed, but interest by Clinton County dairies in a community digester has waned. These farmers are interested in individual digesters, but have not committed to pursuing. Illinois EPA continues to explore all opportunities to promote and enable the use of digesters.</p> <p>2015 Status: No changes from 2014 status.</p>
Joint Priority	Data Synchronization in ICIS	Marcia Willhite	The Integrated Compliance Information System (ICIS) is used directly by the Illinois EPA to evaluate NPDES compliance. It is also used as a source of information for USEPA and the public (via ECHO) on the performance of Illinois EPA's compliance program. Synchronization of data between what Illinois EPA enters and what USEPA draws from the system is crucial, particularly when developing Quarterly Non-Compliance reports (major dischargers) and Annual Non-Compliance Reports (minors). Yet, Illinois EPA continues to spend much time and effort correcting data errors when preparing required reports or fielding calls from dischargers and the public when erroneous data appears in ECHO. Illinois EPA and USEPA will work together to identify the root causes of data discrepancies and propose/implement solutions.	<p>2014 Status: Illinois EPA has worked with USEPA HQ on some specific problems, but we have not initiated a collaborative process with Region 5 to identify root causes of discrepancies.</p> <p>2015 Status: The Joint Priority Work group (IEPA and Region 5) has identified several root causes of data discrepancies. A strategy has been developed and the requirements/objectives of the strategy have been outlined along with several proposed solutions.</p> <p><u>Accomplishments to date include:</u></p> <ul style="list-style-type: none"> ○ Administratively resolve DMR non-receipts for minors with violations detected prior to 9/30/13. ○ RNC Auto refreshes run for FY12 - FY14 ○ Developed custom reports

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				1. DMR Non-Receipt Violations Forecast 2. Schedule Event Forecast 3. Schedule Event Violations Forecast
Environmental Justice	Screen all incoming permit actions/applications for potential Environmental Justice issues.	Ken Page	In accordance with the Environmental Justice (EJ) Public Participation Procedure report all proposed permitting actions for facilities located in potential EJ areas as determined by Illinois EPA's screening tool to the EJ Officer for further outreach.	2014 Status: All permitting actions are reported to the EJ officer via the current notification process. 2015 Status: On-going.

DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN

With regard to Illinois' Drinking Water Resource Deployment Plan (PPA), during the week of November 28, 2011, a "team," consisting of representatives of U.S. EPA and The Cadmus Group, Inc., conducted a triennial review at the IEPA and the Illinois Department of Public Health (IDPH). A report of this review was prepared by The Cadmus Group on December 29, 2011. This report identified areas of quality improvement, but generally recognized that every attempt is made by both the Illinois EPA and IDPH to assure public health protection and administration of all of the elements within the Resource Deployment Plan.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DRINKING WATER ANNUAL RESOURCE DEPLOYMENT PLAN (ARDP)
Fiscal Year 2014-and 2015
(October 1, 2013 to September 30, 2015)

Not all State Public Water System Supervision (PWSS) programs have access to enough resources to implement all of the provisions of existing drinking water regulations, and other primacy program requirements. Resource shortfalls have occurred as the regulations, mandated by the Safe Drinking Water Act (SDWA), come into effect.

Therefore, we need to plan for circumstances where resources are inadequate to implement the entire drinking water protection program. Since the purpose of the SDWA is to protect public health, federal and state agencies have an obligation to ensure that limited resources are deployed in a way that ensures maximum health protection benefit, and that we collectively keep track of what is and is not being done as we strive for full implementation.

To that end, Region 5, in cooperation with our State program partners, has developed a program plan that includes all of the major activities required by primacy regulations and primary drinking water regulations, to guide annual workplan and/or EnPPA discussions leading to annual grant commitments and work-sharing agreements. The plan documents what will and will not be done during the year. The agreement reflects state capacity based on available resources, as well as local health protection priorities. For instance, in a state where radionuclides are prevalent, the state may need to devote proportionately more resources to implementing that regulation than another state, where arsenic is more prevalent.

Core activities, such as explaining regulation requirements to public water supplies, and tracking and reporting violations, are fundamental to the integrity of the public health protection program and are not amenable to priority-setting. U.S. EPA will participate and support state implementation efforts where appropriate and possible. U.S. EPA commitments in support of State programs are listed in the table. Priority activities are flagged throughout the ARDP (denoted with a triangle ►), which will be tracked more than once per year.

The State and U.S. EPA will both report annually on their accomplishments so we can jointly appraise our effectiveness, and our progress toward implementing the complete program. Where resource shortfalls continue to exist, the State and EPA will simultaneously continue efforts to obtain additional resources in order to fill the resource gap. State and EPA efforts to obtain additional resources necessary to fill the gaps associated with temporarily disinvested activities will be documented in the end-of-year evaluation reports.

Using this resource deployment plan as a framework for annual planning and progress assessment should meet several objectives:

- (1) Promote clear understanding of both State and U.S. EPA commitments.
- (2) Minimize ad hoc requests for program reporting.
- (3) Promote judicious use of limited resources to achieve the best possible public health protection.
- (4) Support efforts to increase resources by clearly identifying resource and program constraints.
- (5) Promote collaborative inter-agency program planning and implementation.

PUBLIC WATER SYSTEM SUPERVISION PROGRAM
CORE STATE ACTIVITIES

- ⇒ Provide an adequate laboratory certification program for all regulated contaminants. This does not mean that States must expand their labs to perform all the analyses. At a minimum, a State should have an adequate certification program to certify commercial labs within the State.
- ⇒ Maintain a data management system that tracks requirements for all rules. This means the state should have the appropriate combination of hardware, software and personnel to accurately and within a reasonable timeframe identify the inventories (including routine updates of system information), maintain water quality monitoring information, and track compliance with all M/R, MCL, MRDL, TT, PN and public information requirements.
- ⇒ Keep adequate records of pertinent State decisions.
- ⇒ Adopt all rules in a timely manner (within two year extension period).
- ⇒ Notify all systems of regulatory requirements and respond to questions.
- ⇒ Determine violations for all rules and report to U.S. EPA.¹
- ⇒ Maintain an adequate enforcement and compliance assistance program (adequacy determined by a decrease in violation frequency).
- ⇒ Maintain a baseline core of individuals with the technical expertise needed, to perform sanitary surveys, plan and spec reviews, and respond to emergencies.
- ⇒ To improve our ability to understand, measure, assess, and communicate progress, conduct a joint evaluation of program performance with EPA.
- ⇒ Develop and implement a plan to provide adequate funding to carry out all functions of the PWSS program.

¹ States must report actions and sample data quarterly and inventory data at least annually in accordance with 40 CFR 142.15. These data must be reported in XML format and utilize the Central Data Exchange (CDX) as the media for data transfer to U.S. EPA. The reporting schedule for States to the national database, SDWIS/FED-ODS, is as follows: FFYQ1 – February 15, FFYQ2 – May 15, FFYQ3 – August 15, and FFYQ4 – November 15. If the data is not reported within 60 days, the Region will raise the issue to the State Director's attention.

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CORE R5 ACTIVITIES

Respond to questions from our state programs about regulations. Train state staff about treatment regulations by offering in-state and/or regional training opportunities.

Maintain a forum for U.S. EPA-State communications through the monthly U.S. EPA-State conference calls, holding annual meeting, and conducting additional meetings/calls as needed.

Track primacy submittal/review for all rules and provide comments on draft rules, as requested.

Determine whether primacy applications are complete and determine tracking required for new rules by state.

Assist states in acquiring resources to carry out all functions of the PWSS program.

Monitor specific regulations related to State follow-up to the findings of the last data and enforcement verification reports, as indicated in the "R5 Activities" column.

Acronyms/Abbreviations	
<p>ACS – Annual Commitment System</p> <p>ARDP – Annual Resource Deployment Plan</p> <p>As – Arsenic</p> <p>CCR – Consumer Confidence Report</p> <p>CFR – Code of Federal Regulations</p> <p>CPE – Comprehensive Performance Evaluation</p> <p>CTA – Comprehensive Technical Assistance</p> <p>CWA – Clean Water Act</p> <p>CWS – Community Water System</p> <p>DBP – Disinfection By-Products</p> <p>D/DBPR – Disinfectants and Disinfection By-Products Rule</p> <p>DWA – Drinking Water Academy</p> <p>DWSRF – Drinking Water State Revolving Fund</p> <p>eDV – Electronic Data Verification (Tool)</p> <p>EnPPA – Environmental Performance Partnership Agreement</p> <p>ERG – Expense Reimbursement Grant</p> <p>ERP – Enforcement Response Policy</p> <p>ETT – ERP Enforcement Targeting Tool</p> <p>FBRR – Filter Backwash Recycling Rule</p> <p>GWR – Ground Water Rule</p> <p>GWS – Ground Water System</p> <p>GUDI – Ground Water under the Direct Influence of Surface Water</p> <p>HAA5 – Haloacetic Acids</p> <p>HSA – Hydrogeologic Sensitivity Assessment</p> <p>IDSE – Individual Distribution System Evaluation</p> <p>IESWTR – Interim Enhanced Surface Water Treatment Rule</p> <p>IOC – Inorganic Contaminant</p>	<p>MRDL – Maximum Residual Disinfectant Level</p> <p>NCWS – Non-Community Water System</p> <p>NPDWR – National Primary Drinking Water Regulation</p> <p>NTNCWS – Non-Transient Non-Community Water System</p> <p>OCC – Optimal Corrosion Control Treatment</p> <p>pCi/L – picoCurie per liter</p> <p>PN – Public Notification</p> <p>ppb – part per billion</p> <p>PWS – Public Water System</p> <p>PWSID – Public Water System Identification</p> <p>PWSS – Public Water System Supervision</p> <p>Rads – Radionuclides</p> <p>RTC – Returned to Compliance</p> <p>SDWA – Safe Drinking Water Act</p> <p>SDWIS/FED – Safe Drinking Water Information System/Federal</p> <p>SDWIS/State – Safe Drinking Water Information System/State</p> <p>SNCs – Significant Non-Compliers</p> <p>SOC – Synthetic Organic Contaminant</p> <p>SOX – "SOX" is a code in SDWIS/FED that indicates the state entered a return to compliance for a violation</p> <p>SPM – U.S. EPA Region 5 Ground Water and Drinking Water Branch State Program Manager</p> <p>Stage 2 – The Stage 2 Disinfectants and Disinfection By-Products Rule</p> <p>SWAP – Source Water Assessment Program</p> <p>SWP – Source Water Protection</p> <p>SWTR – Surface Water Treatment Rule</p> <p>TCR – Total Coliform Rule</p> <p>TMDL – Total Maximum Daily Load</p> <p>TT – Treatment Technique</p> <p>TTHM – Total Trihalomethanes</p>

IUP – Intended Use Plan LCR – Lead and Copper Rule LT1ESWTR – Long-Term 1 Enhanced Surface Water Treatment Rule LT2ESWTR – Long-Term 2 Enhanced Surface Water Treatment Rule MCL – Maximum Contaminant Level M/R – Monitoring/Reporting	UCMR – Unregulated Contaminant Monitoring Rule V&E – Variances and Exemptions VOC – Volatile Organic Contaminant WBDO – Waterborne Disease Outbreak WQP – Water Quality Parameter
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Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.1 – Adopt all rules in a timely manner (within two year extension period)</p> <p>Issue: “There are concerns that the emerging technologies associated with LT2SWTR (ultraviolet light disinfection and membrane filtration specifically) are increasingly difficult due to their complexity and lack of staff capable of devoting sufficient time to study the issues. Additional staff in the Permit Section is desirable to devote adequate resources to them.”</p>	<p>Illinois EPA has adopted the rules above and is implementing provisions of the rules thru inspections and providing training, technical assistance and taking enforcement actions as necessary.</p>	<p>Region 5 is currently working on the primacy approval for the Radionuclide Rule and the Interim Enhanced Surface Water Treatment Rule.</p>	<p>2014 Status: While concern remains regarding adequate staffing levels with respect to rule implementation, the Illinois EPA has made significant progress in evaluating and permitting emerging technologies including UV and advance membrane filtration.</p> <p>2015 Status: Status unchanged from 2014.</p>
<p>1.2 – Notify all surface water and GUDI systems of their regulatory requirements.</p>	<p>Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.</p>	<p>As requested, promote understanding of surface water treatment regulations by conducting presentations at state water industry organization functions.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
<p>1.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the Surface Water Treatment Rules.</p>	<p>Data is maintained in SDWIS/State.</p>		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.4 – Electronically report all TT, M/R, and PN violations and inventory updates to SDWIS/FED for all surface water systems.	Data is maintained in SDWIS/State and will be used to update SDWIS/FED.	<p>► Region 5 will evaluate extent to which LT2 violations are reported to SDWIS/FED.¹</p> <p>New Rule Violations as of April 2013 (2010-2012 data) –</p> <p>M/R – LT2 ESWTR – 1</p> <p>New Rule Violations for April 2014 –</p> <p>1 M/R – LT2SWTR</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: January 2015 freeze LT2: 17 TT; 1 M&R</p> <p>January 2016 freeze LT2: 17 TT; 1 M&R</p>

¹ **NEW RULE VIOLATION REPORTING QUERY:** The new rule violation reporting query includes all violations for the new rules ever reported for any system type regardless of activity status, which means that there may be violations reported for currently closed systems. The specific rule violation codes included in this query are:

- LCRSTR – 66
- Stage 2 – 30, 35
- LT2 – 32, 33, 37/0800, 41/0800, 42/0800, 45/0800, and 47/0800
- GWR – 31/0700, 34, 41/0700, 42/0700, 45/0700, 48, 73 (36/0700 was an old code programmed into SDWIS/State)

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
<p>1.5 – Conduct and report sanitary surveys at surface water (40 CFR Part 141 Subpart H) systems. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Illinois has committed to completing 90% of the surface water sanitary surveys under the national measures.</p>	<p>Provide training, as requested.</p> <p>► Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).²</p> <p>As of April 2013 (2010-2012 data)</p> <p>CWS – 86 not completed, 490 completed, 576 total systems – 85.1%</p> <p>NTNCWS – 0 not, 7 completed, 7 total – 100%</p> <p>TNCWS – 0 not, 123 completed, 123 total – 100%</p> <p>As of April 2014 (2011-2013 data)</p> <p>CWS 86.1%, NTNCWS and TNCWS 100% complete</p> <p>This national measure will be reported again in July 2015 for the period of 2012-2014.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged. In FFY 14, the Illinois EPA inspected 91.5% of the community water supplies in Illinois within the last three years.</p> <p>2015 Status: 91.2% (1,590 of 1,743 CWS) have been inspected within the last three years.</p> <p>EPA Response: June 2015: for CY2013-2015 for CWS and CY2011-2015 for NCWS. For SW, at CWS 476/582 = 81.2% had sanitary surveys (SS) completed within the last 3 years, and 100% and 96.0% of NTNCWS and TNCWS, respectively, had SS in the past 5 years. Of the CWS, 84 purchased SW CWS have no SS out of 403 systems, or (17%); but 22 original SW CWS have no SS out of 68 systems (24%). So an even higher percentage of original systems have not had a SS. It would be good to focus on these original systems, who sell water to other systems.</p>

² **SANITARY SURVEY COMPLETENESS QUERY:** The sanitary survey completeness query includes data for all currently active systems. A national measure tracks sanitary survey completeness at surface CWSs as indicated in attachment A (see SDW-1a). The data from the appropriate reporting period will be frozen and considered final at in July of every years.

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.6 – Ensure that all surface water and GUDI systems that notify the State that they recycle spent filter backwash water, thickener supernatant, or liquids from dewatering processes, return these flows through the processes of a system's existing conventional or direct filtration system, or at alternate location approved by the State.	Replies have been received from all surface water supplies.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
1.7 – Use sanitary surveys, CPEs, other inspections, or other activities to evaluate recycled backwash water practices when they occur at surface water and GUDI systems. When those practices are not in compliance with the FBRR require the system to modify the practices to achieve compliance.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
1.8 – Ensure that filter/disinfection practices are adequate to achieve inactivation/removal requirements for regulated microbial contaminants found in surface water sources.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.9 – Follow-up on turbidity TT violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.10 – Follow-up on individual filter turbidity M/R violations. a. Track individual filter turbidity trigger exceedances. b. Track completion of individual filter turbidity profiles for systems exceeding individual filter triggering criteria.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.11 – When required, track the completion of CPE/CTA for PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.12 – Ensure that a residual disinfectant concentration is measured according to rule requirements.	Ongoing – will continue.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.13 – Follow-up on disinfection residual TT violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Surface Water Treatment Rules: FBRR, SWTR, IESWTR, LT1ESWTR, LT2ESWTR			
1.14 – Follow up on disinfection residual M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.15 – Report treatment data (e.g., treatment codes for all surface water, GUDI, and purchased GUDI sources, seller's PWSID number for purchased surface water and purchased GUDI sources, etc.)	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.16 – Ensure that disinfection profiling and benchmarking is conducted when required by rule.	Ongoing – will continue		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.17 – Ensure that all required records are kept by surface water systems.	Ongoing – will continue.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
1.18 – Complete remaining GUDI determinations.	Ongoing – will continue		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rule			
2.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
2.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information) and violations for the TCR.	Ongoing – will continue. Tracked in SDWIS/State		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: EPA is concerned about the insufficient reporting of TCR M&R violations and TCR and nitrate MCL violations at the NCWS to SDWIS/Fed and will continue to work with IEPA to address these concerns.</p>
2.3 – Electronically report all TCR MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State		<p>2014 Status: The Illinois EPA commitment is unchanged. However, the Illinois EPA is concerned that U.S. EPA must follow through on providing a tool to track revisions to the TCR in the existing version of SDWIS until the new web based version of the program becomes fully implemented.</p> <p>2015 Status: Status unchanged from 2014.</p>

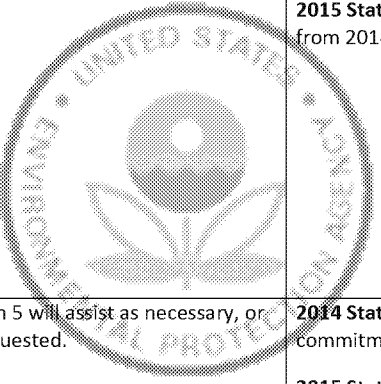
Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Total Coliform Rule			
2.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
<p>2.5 – Ensure sanitary surveys are conducted periodically that, at a minimum, meet frequency requirements specified by rule.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. Illinois is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Groundwater Section staff are updating source water assessments and Drinking Water Program Staff are seeking efficiencies to encourage Capacity Development at community water supplies.</p>		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
2.6 – Follow-up on all M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.1 – Adopt the GWR in a timely manner (within two year extension period).	The IPCB adopted the GWR on 7/27/2007 and the Primacy Application was delivered to Region 5 on 11/3/2009.	GWR primacy was approved on July 29, 2013.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
3.2 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	As requested, promote understanding of the GWR by conducting presentations at state water industry organization functions after promulgation.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
3.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the GWR.	<i>States to relay to Region 5 any issues with limited SDWIS/State rule tracking functionality.</i> The Illinois EPA has not yet encountered limitations.	Region 5 commits to communicate any issues our states have with limited SDWIS/State rule tracking functionality to HQ via the national GWR workgroup.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
3.4 – Electronically report all TT, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Data will be tracked in SDWIS/State and transferred to SDWIS 3.0 when available.	<p>► Region 5 will evaluate extent to which GWR violations are reported to SDWIS/FED.¹</p> <p>New Rule Violations: as of April 2013 (2010-2012 data) — M/R — GWR — 8 Other — GWR — 1 As of April 2014 — M/R — GWR — 11 Other — GWR — 1 January 2015 freeze: 0 TT; 11 MR; 1 Other January 2016 freeze: 0 TT; 49MR; 1 Other</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: EPA notes the number of GWR M/R violations has increased significantly from FY2014 to FY2015.</p>

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
<p>3.5 – Conduct and report sanitary surveys that meet requirements by 12/31/12 at CWSs and then every 3 years thereafter, and by 12/31/14 at NCWSs served by a groundwater source and then every 5 years thereafter. A completed sanitary survey means the date a sanitary survey visit was conducted in which all eight sanitary survey components have been addressed per 142.16(b)(3)(i). If a sanitary survey takes multiple days or visits to complete, only the latest date or last visit is expected to be reported for the final visit date that completes the eight components of a sanitary survey.</p> <p>Consider using sanitary surveys to evaluate and document status and progress of Source Water Protection and Sustainable Infrastructure activities (see sections 4.0 and 7.0 of the “other activities” section below, respectively).</p> <p>Issue: (same issues regarding staff resource as in LT2SWTR in 1.1)</p>	<p>Sanitary surveys will be conducted on all CWS as frequently as feasible under existing resource constraints. IL is committed to taking corrective actions that will comply with the requirements of this Rule. NCWSs are on a 1 to 2 year cycle.</p> <p>Reports will be made as resources allow.</p>	<p>► Region 5 will measure completeness of sanitary surveys within evaluation time period (three or five years).²</p> <p>As of April 2013 (2010-2012) data CWS – 271 not, 883 completed, 1154 total, 76.5% NTNCWS – 3 not, 352 completed, 360 total, 97.8% TNCWS – 43 not, 2833 completed, 2875 total, 98.5%</p> <p>As of April 2014 (2011-2013) data, for GW</p> <p>CWS – 78.2% completed NTNCWS – 97.5% completed TNCWS – 98.4% completed</p> <p>October 2015 (data as of June 2015): For CWS 961/1142 = 84.2% had SS completed in last 3 years; 97.8% of NTNCWS and 98.3% of TNCWS had SS in the last 5 years</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: For CWS the percent completed sanitary surveys has improved from 2014 to 2015.</p> <p>For CWS, there was not much difference between original GW and GW purchased in terms of SS, 84% vs. 86%, respectively</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.6 – Ensure that GWSs that must treat to the 4-log virus removal/inactivation standard conduct compliance monitoring to demonstrate treatment effectiveness.	Treatment will be required when necessary to ensure a multi-barrier protection strategy at all community water supplies in Illinois		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.7 – Determine appropriate corrective actions in consultation with GWSs that collect fecal indicator-positive source water sample(s) or that have significant deficiencies.	<p>Illinois EPA is implementing a groundwater rule implementation strategy approved by Region 5.</p> <p>Illinois DPH will implement the triggered source water monitoring requirements by the compliance date specified in the GWR</p>		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.8 – Determine when TT violations occur and follow-up to return them to compliance.	See 3.7 above.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.9 – Determine if optional source water monitoring will be used. If so, apply monitoring requirements to selected systems.	Ongoing – follow up actions will be taken as appropriate.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.10 – Follow-up on corrective action consultation and reporting violations.	Ongoing – follow up actions will be taken as appropriate.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.11 – Follow-up on M/R violations.	Ongoing – follow up actions will be taken as appropriate.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Ground Water Rule			
3.12 – Follow-up on public notification violations.	Ongoing – follow up actions will be taken as appropriate.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.13 – Follow-up on other discovered recordkeeping/reporting violations.	Ongoing – follow up actions will be taken as appropriate.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.1 – Notify all public water systems of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
4.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and tracks nitrate/nitrite violations.	Ongoing – will continue. Tracked in SDWIS/State.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: EPA is concerned about the insufficient reporting of TCR M&R violations and TCR and nitrate MCL violations at the NCWS to SDWIS/Fed and will continue to work with IEPA to address these concerns.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Nitrate and Nitrite			
4.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State.	In 2012, 88.9% of reporting was on time. In 2013, 100% of reporting was on time.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014. EPA Response: As of the April 2015 freeze, for CY2010-2014, IDPH has shown a drop off in nitrate violations reporting from 94 in 2010 to 3 in 2011 and 0 in 2012-2014. IBPA, as the primacy agency, needs to work with IDPH to ensure full and timely reporting.
4.4 – Follow-up on all MCL violations and determine a proper course of action to ensure public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
4.5 – Follow-up on M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation

5.0 – Lead and Copper			
5.1 – Adopt LCR short-term revisions (LCRSTR) in a timely manner (within two-year extension period).	Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented. Illinois DPH has submitted milestone data to the ODS and will continue updating data.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
5.2 – Incorporate rule revisions into state oversight and enforcement operations.	Illinois PCB has adopted the LCR short term and minor revisions and the rules are being implemented.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
5.3 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
5.4 – Maintain a data base management system that accurately tracks lead and copper action level exceedances (sample data), violations, and milestone data for CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status:

Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.5 – Electronically report violation and milestone data to SDWIS/FED for all CWSs and NTNCWSs, lead and copper 90 th percentile action level sample data for all large and medium sized systems, and 90 th percentile action level exceedance sample data for small systems.	Ongoing – will continue. Tracked in SDWIS/State.	<p>Region 5 will finalize the LCR module of the compliance determination and violation reporting training (CDVRT).</p> <p>► Region 5 will evaluate extent to which LCRSTR violations are reported to SDWIS/FED.¹</p> <p>New Rules for LCR: Violations as of April 2013 (2010-2012 data) M/R – LCR – 151 As of April 2014, M/R – LCR – 208</p> <p>As of January 2015, there were 207 M/R LCR violations As of January 2016, there were 211 M/R LCR violations</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: There was only a very slight increase in LCR violations from January 2015 to January 2016, increasing from 207 to 211, an increase of 4.</p>
5.6 – Designate OCCT and follow-up on OCCT installation violations at all required PWSs.	Ongoing – will continue. Tracked in SDWIS/State.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
5.7 – Follow-up on all M/R violations.	Ongoing – will continue. SDWIS/State used to track and flag violations and follow-up using sanitary survey investigation as needed.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
5.8 – Optimize corrosion control at NTNCWSs that are unlikely to serve water to sensitive sub-populations.	Ongoing- will continue.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – Lead and Copper			
5.9 – Set optimal water quality parameter ranges and/or minimum values for all CWSs and NTNCWSs where required by the LCR.	Ongoing-will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>



Table 1. Primacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted LT2 & Stage 2 rules and Illinois EPA & Illinois DPH are in the process of implementing the regulations.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: IEPA has been implementing the Stage 2 DBP Rule according to schedule.</p>
6.2 – Notify all CWSs and NTNCWSs (serving greater than 10,000 people) delivering water that has been treated with a primary or residual disinfectant (other than ultraviolet light) of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
6.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the D/DBP rule.	Data will be maintained in SDWIS/ State		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Privacy Activities

Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.4 – Electronically report all MCL, M/R TT and PN violations and inventory updates to SDWIS/FED for all public water systems.	Ongoing – will continue. Tracked in SDWIS/State	<p>► Region 5 will evaluate extent to which Stage 2 violations are reported to SDWIS/FED.¹</p> <p>New Rules: Violations as of April 2013 (2010-2012 data) – 11</p> <p>Violations as of April 2014 – 7 Stage 1 & 2 DBP MCL violations</p> <p>Violations as of October 2014 (January 2015 freeze), there were 8 MCL and 16 M/R Stage 2 violations reported.</p> <p>As of October 2015 (January 2016 freeze), these numbers had increased to 65 MCL and 64 M/R.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
6.5 – Follow-up on chlorine dioxide MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
6.6 – Follow-up on all other MCL/MRDL violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
6.7 – Ensure that Subpart H systems using conventional filtration operate in compliance with the DBP precursor control treatment technique requirements.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – D/DBPRs			
6.8 – Follow-up on all M/R violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
6.9 – Determine which systems do not qualify for reduced monitoring and inform them they must return to the routine monitoring frequency.	Ongoing – will continue		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
6.10 – Follow-up on all other reporting requirement violations.	Ongoing – will continue	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
7.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted IOC Rules and they are being implemented (including arsenic).	Primacy was approved for the Arsenic Rule on July 29, 2013.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
7.2 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
7.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – IOCs (including Arsenic)			
system information), and violations for the IOCs.			from 2014.
7.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.	<p>As of January 2013, there were 0.5% CWS, 0.2% NTNCWS and 0.0% TNCWS not RTC'd of the active systems for 2012.</p> <p>As of January 2014, there were 0.5% CWS, 0.7% NTNCWS and 0.0% TNCWS not RTC'd of the active systems for 2013.</p> <p>As of January 2015, there were 0.6% CWS (10/1743), 0.7% NTNCWS (3/420) and 0.0% TNCWS (0/333) not RTC'd of the active systems for 2014.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
7.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
7.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Radionuclides (including Radon)			
8.1 – Adopt all rule changes in a timely manner (within two year extension period).	Illinois PCB has adopted Radionuclide Rules and they are being implemented.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
8.2 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
8.3 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for radionuclides.	Ongoing – will continue.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
8.4 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs.	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
8.5 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
8.6 – Follow-up on M/R violations.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested. In the timeframe 2008-2012, there were 20 Radon M/R violations.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
9.0 – SOC's			
9.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
9.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for the SOC's.	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
9.3 – Electronically report all MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
9.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
9.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
10.0 – VOCs			
10.1 – Notify all CWSs and NTNCWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
10.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system info), and violations for VOCs.	Ongoing – will continue. Tracked in SDWIS/State		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
10.3 – Electronically report all VOC MCL, M/R and PN violations and inventory updates to SDWIS/FED for all CWSs and NTNCWSs.	Ongoing – will continue. Tracked in SDWIS/State		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
10.4 – Follow-up on MCL violations and take an appropriate course of action that ensures public health protection.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
10.5 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
11.0 – Organic and Inorganic Chemical Monitoring Waiver Program			
11.1 – Any changes to the originally approved waiver program must be submitted to Region 5 for approval.	<p>Changes to the approved program not needed during the reporting period.</p> <p>Applicable system's waivers will be evaluated during the appropriate compliance period.</p>		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
12.0 – Sodium			
12.1 – Notify all CWSs of their regulatory requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
12.2 – Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), and violations for sodium M/Rs.	Ongoing – will continue. Tracked in SDWIS/State.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
12.3 – Notify appropriate local and State health departments of the sodium levels in CWS drinking water.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
12.0 – Sodium			
12.4 – Follow-up on M/R violations.	Ongoing – will continue.	Region 5 will assist as necessary, or as requested.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

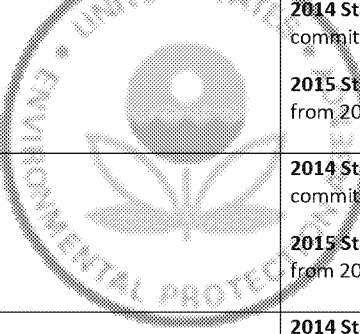
Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
13.0 – Public Notification			
13.1 – Notify all public water systems of their public notification requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
13.2 – Maintain a data base management system that accurately tracks PN violations.	Ongoing – will continue. Tracked in SDWIS/State		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
13.3 – Electronically report all public notification violations to SDWIS/FED.	Ongoing – will continue.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
13.4 – Follow-up on all Tier 1, 2 & 3 violations.	Ongoing – will continue.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
14.0 – CCR			
14.1 – Notify all regulated water systems of their CCR requirements.	Public water systems are notified of their requirements, and monitoring schedules are updated and made available on-line.	A memorandum signed on January 3, 2013, clarifies electronic delivery options for CCRs (see http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf).	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
14.2 – Maintain a data base management system that accurately tracks CCR violations.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
14.3 – Electronically report all CCR violations to SDWIS/FED.	Ongoing – will continue. Tracked in SDWIS/State.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
14.4 – Enforce the rule when the water system has not issued a CCR or issued one with insufficient content.	Ongoing – will continue. Tracked in SDWIS/State.	Region 5 will assist as necessary, or as requested.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
15.0 – Laboratory Certification			
<p>15.1 – All laboratories that produce results for compliance with SDWA are certified by the State to which those results are reported. These certifications shall be done at a frequency of at least once every three years and will meet all requirements of 40 CFR parts 141 and 142. Guidance for these certifications is provided in the <u>EPA Manual for the Certification of Laboratories Analyzing Drinking Water</u>, Fifth Edition. Third parties may be used to conduct the on-site inspections of the laboratories, but the certifications must be issued by an appropriate State official.</p> <p>Issue: “State travel restrictions continue to prevent the training of additional staff to provide back-up for conducting the on-site laboratory assessments”</p>	<p>Illinois does require that all laboratories be certified for SDWA sample result submission and certification occurs every two years. The laboratories are certified to NELAC standards which are equivalent to the EPA Manual. At this time, third parties are not being used to conduct on-site visits.</p> <p>The Illinois EPA will pursue regulatory changes to accept third party certification of radiological samples. Additionally, the Illinois EPA will evaluate long term solutions to Radiological Lab Certification in Illinois.</p>	<p>Region 5 expects to conduct lab audits and program reviews in FY 2015.</p>	<p>2014 Status: Regulations have been passed by Illinois allowing for the use of other State’s certified labs for radiological analyses in the absence of programs certified by IEMA.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: The lab audit was conducted in September 2015 by Region 5 for IEPA’s principal state lab for chemistry, IDPH’s principal state lab for microbiology and both IEPA’s and IDPH’s lab certification program. The final recertification decision will be made in 2016.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
16.1 – Participate with Region 5 in compliance and enforcement planning actions including referrals, Enforcement Verification audits, and state compliance and enforcement strategy updates.	Illinois EPA and Illinois DPH commit to participate in PWS program reviews for CWS & NCWS.		2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
16.2 – The State will conduct compliance assistance and enforcement activities to help prevent systems from becoming ERP priorities and to address or resolve ERP priority systems within six months after being identified as priorities.	Ongoing – will continue. Tracked in SDWIS /State	Assist with enforcement referrals, enhanced data exchange, analysis, data clean up, or other joint efforts as requested by state.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
16.3 – Evaluate compliance with all rules for which the State has primacy. Respond to all violations, provide compliance assistance where appropriate and escalate to formal enforcement where systems have not returned to compliance in a timely way or are not complying with a schedule to return to compliance.	Ongoing – will continue.	Assist with enforcement referrals, analysis, and data clean up or other joint efforts as requested by state.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
16.4 – The State will send R5 an update on compliance and enforcement activities, within the timeframe requested in the quarterly ERP letter.	Ongoing – Illinois EPA will continue to provide timely updates to USEPA-Region 5 requests.	Each quarter, Region 5 will send the states updated ERP reports requesting a state update. Region 5 will integrate State updates into reports before the next request is sent out.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.

Table 1. Privacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
16.5 – Electronically report state formal enforcement actions, return to compliance (SOX) dates, and deactivation dates to SDWIS/FED, and correct data errors in SDWIS/FED which result in systems erroneously being classified as priorities based on the ERP. Reporting SOX dates and enforcement actions and ensuring to link to all appropriate violations helps ensure an accurate ERP list.	The State will update SDWIS/FED with this information quarterly, and link ERP addressing enforcement actions, and/or SOX dates to violations as appropriate such that SDWIS/FED accurately represents those actions for each violation affected.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
16.6 – See OECA annual commitment system (ACS) measure (SDWA02) in Attachment A. Commit to address and resolve a specific number of systems between July 2013 and June 2014.	The Illinois EPA has adopted legislation making current Compliance Commitment Agreements enforceable. This measure has been completed.	► Region 5 will track state commitments under measure SDWA02 and update state quarterly, engaging in discussion with states on progress as needed.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
17.0 – Data Management			
17.1 – State must use the latest version of SDWIS/FedRep to validate and correct errors prior to data submittal. The State must also correct all object errors and as many data quality errors identified by the SDWIS/FED-ODS processing software. These corrections should be submitted before the end of the quarter. Further, States should follow agreed upon protocol (dated 10/5/2006) for transmittal, receipt, and review of output reports by the Region.	For each data submission with errors, the State will contact the Region about their plans for fixing the errors.	Provide technical assistance and program assistance to all Region 5 States related to data management.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: EPA is concerned about the insufficient reporting of TCR M&R violations and TCR and nitrate MCL violations at the NCWS to SDWIS/Fed and will continue to work with IEPA to address these concerns.</p>
17.2 – Continue to improve inventory reporting to SDWIS/FED focusing primarily on inventory data quality errors and improving locational data for CWS intakes, wells, and treatment plants for increased emphasis on Regional emergency response needs.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
<p>17.3 – Continue to improve the data reliability by the following activities (Data Quality Improvement Plan):</p> <p>17.3a – State will commit to full automation including electronic reporting from labs and automated monitoring schedule generation and system notification.</p>	<p>Since data management is critical to each State's ability to maintain primacy, when possible, the State will continue to send a representative to the annual ASDWA Data Management Users conference.</p> <p>Note: Item 17.3g has been Completed and data will continue to be updated.</p>	<p>Region 5 is continuing to develop compliance determination and violation reporting training (CDVRT). The LCR CDVRT module is nearly complete. In addition, we are trying to obtain funding to complete the remaining modules.</p> <p>April 2013 frozen data: In 2012, Illinois showed 98.4% of its TCR reporting on-time. Excellent</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
16.0 – Compliance and Enforcement Management			
<p>17.3b – State will automate the compliance determinations for all rules for which it has primacy.</p> <p>17.3c – State will update standard operating procedures, as necessary, to ensure proper compliance determinations are being made.</p> <p>17.3d – State will provide timely compliance determination training to staff, particularly for new rules.</p> <p>17.3e – The State will work with the Region to test/evaluate the eDV tool.</p> <p>17.3f – For States using SDWIS/State, if they are not using the most current version of SDWIS/State, they should commit to a timeframe for when that would happen. In addition, the State should list those modules they are not using at all or not fully utilizing and describe the State's plans or schedule to use them including the eDV tool.</p> <p>17.3g – The State will ensure the accuracy of the service area reporting for school and daycare PWSs and make revisions as necessary.</p>		<p>improvement.</p> <p>April 2013 data freeze: 88.9% of 2012 nitrate reporting was on-time and 100% within one quarter.</p> <p>April 2014 – In 2013, 96.0% of TCR and 100% of nitrate reporting was on-time.</p> <p>FY2014: Number of systems addressed as of July 2014 was 24, 33% over the target.</p> <p>FY2015: Number of systems addressed as of July 2015 was 19, which is 112% of IEPA's goal.</p> <p>Region 5 requests that IL copy Region 5 when responding to the annual headquarters survey asking about which states are using various SDWIS/State components.</p>	

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
18.0 – Annual Compliance Report			
18.1 – Prepare and submit an Annual Compliance Report (ACR). Please provide a summary of the number and percentage of systems (by system type) in compliance with monitoring requirements, by rule, as part of this report.	Illinois EPA will provide future reports by July 1 st of each calendar year	OECA to provide annual ACR guidance. R5 will forward guidance when received.	2014 Status: The Illinois EPA commitment is unchanged. 2015 Status: Status unchanged from 2014.
19.0 – Variances and Exemptions			
19.1 – Follow all variance and exemption requirements when variances and exemptions are allowed by the State.	This is not applicable to Illinois.		

Table 1. Primacy Activities																			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation																
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals																			
20.1 – Gather information to track strategic plan progress. State directors will attend the annual Region 5 state directors meeting in April 2014 and April 2015 to discuss primacy and implementation issues.	Illinois EPA will report these measures through the PPA.	Compile information and report to HQ. Annually assess each State’s progress in attaining the shared goals milestones, and identify U.S. EPA or State follow-up actions needed to maintain or improve compliance. Negotiate appropriate disinvestments with States as necessary to ensure that the highest priority work is done. Work with State Drinking Water and Ground Water Programs to increase public understanding of the impacts of	Shared Goals: by 2016 meet the following: <table><tr><td>Goal:</td><td>CY14:</td></tr><tr><td>Milestone 1</td><td>≥95.0% 96.5%</td></tr><tr><td>Milestone 2</td><td>≥95.0% 99.3%</td></tr><tr><td>Milestone 3</td><td><5.0% 2.2%</td></tr><tr><td>Milestone 4</td><td><10.0% 7.4%</td></tr><tr><td>Milestone 5</td><td><5.0% 1.2%</td></tr><tr><td>Milestone 6</td><td><10.0% 25.1%</td></tr><tr><td>Milestone 7</td><td><10.0% 0.3%</td></tr></table> See shared goals descriptions at end of document. EPA Response: IDPH continues to need improvement for Milestone 6,	Goal:	CY14:	Milestone 1	≥95.0% 96.5%	Milestone 2	≥95.0% 99.3%	Milestone 3	<5.0% 2.2%	Milestone 4	<10.0% 7.4%	Milestone 5	<5.0% 1.2%	Milestone 6	<10.0% 25.1%	Milestone 7	<10.0% 0.3%
Goal:	CY14:																		
Milestone 1	≥95.0% 96.5%																		
Milestone 2	≥95.0% 99.3%																		
Milestone 3	<5.0% 2.2%																		
Milestone 4	<10.0% 7.4%																		
Milestone 5	<5.0% 1.2%																		
Milestone 6	<10.0% 25.1%																		
Milestone 7	<10.0% 0.3%																		

Table 1. Primacy Activities			
Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
20.0 – Conduct Joint Assessment of Program Progress Using Evaluation Tools such as U.S. EPA’s Strategic Plan and State/U.S. EPA Shared Goals			
		<p>budget cuts on public health protection efforts, and assist in state efforts to gain additional program resources.</p> <p>Region 5 will schedule semi-annual conference calls about every six months to discuss status updates and issues regarding state-specific topics.</p>	<p>“<10% of NTNCWS with significant/major monitoring violations for chronic health risks.” This number should be reduced significantly as soon as possible.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
1.0 – Preparing for Security Threats at PWSs			
1.1 – State-specific security work plan activities.	The Illinois EPA will verbally report security activities as needed by U.S. EPA Region 5.	<p>Review work plan updates.</p> <p>Hold quarterly conference calls with state security contacts.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
1.2 – The state has adopted and can implement an adequate plan for the provision of safe drinking water under emergency circumstances including, but not limited to, earthquakes, floods, hurricanes, and other natural disasters.	Illinois EPA has planning documents in association with the Illinois Emergency Management Agency. Based upon resource limitation, sector specific plans may be evaluated in the future to augment existing plans.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
2.0 – Operator Certification			
2.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of the Operator Certification Program to avoid 20% withholding of the DWSRF capitalization grant.	The Illinois EPA will continue to provide these reports annually.	Coordinate information and issues on Op Cert Program implementation and annual reports.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: As of June 29, 2015, IEPA has begun to submit the Op Cert report as part of an overall consolidated report from Illinois.</p>
2.2 – For operators of CWSs and NTNCWSs: (1) provide training and certification opportunities for new operators and (2) provide training and opportunities for upgrading and renewing certification for existing operators.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
2.3 – Provide supplemental certification and training to water system operators on relevant topics from section 7.0 “Sustainable Infrastructure” of the ARDP to ensure sustainable water utilities and water supplies. For example, conduct CEU-eligible training to water operators on supply/demand water efficiency or add supplemental questions on treatment plant energy efficiency activities to certification exams.	The Illinois EPA will coordinate with USEPA-Region 5 on this activity.	Region 5 sustainable water infrastructure (SWI) workgroup will provide training and outreach materials to water system operators and technical assistance providers, in coordination with states.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
3.0 – Capacity Development			
3.1 – Annually provide documentation to U.S. EPA showing the ongoing implementation of both the new systems program and the existing systems strategy to avoid 20% withholding of the DWSRF capitalization grant. Annual report should address the new Capacity Development reporting measures.	<p>Illinois EPA will provide future reports by December 31 of each calendar year.</p> <p>IEPA will provide future reports as part of a consolidated report submitted annually in June.</p>	Region 5 will send a reminder to the State about the capacity development annual report in August 2014 and August 2015.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: The first annual consolidated report was submitted on June 29, 2015. It satisfactorily addressed the needs of the Cap Dev report.</p>
3.2 – Submit a report to the governor and provide a copy to U.S. EPA on the efficacy of the strategy and the progress made toward improving the capacity of water systems in the state.	<p>IEPA will provide future reports to the governor as appropriate.</p> <p>Reports will be submitted by October annually.</p>	Region 5 will send a reminder to the State about the report to the governor in August 2013.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
3.3 – Promote “Sustainable Infrastructure” activities as described in section 7.0 of the ARDP in Capacity Development activities and assessments as part of improving the capacity and sustainability of water systems and water supplies. For example, provide technical assistance on starting an asset management program or conduct energy audits for treatment plants.	Illinois EPA staff continues to seek efficiencies to encourage Capacity Development at community water supplies.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.1 – Update source water assessments, including effects of climate change, as resources allow.	Ongoing – will continue.		<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
4.2 – Assist local community source water protection (SWP) plan preparation and implementation, including climate change adaptation activities, in cooperation with Source Water Collaborative (SWC) members (e.g., National Rural Water Association, American Planning Association, and others).	<p>SWP plan development and implementation will be achieved with assistance from the following SWC partners:</p> <p>Illinois EPA will continue to work with the IRWA and local stakeholder to encourage regulatory and non-regulatory protection programs.</p>	<p>Continue to develop tools as needed, foster cross-program coordination, and encourage coordination with SWC partners to encourage broad-based actions at the state and local levels to address potential sources of contamination.</p> <p>Facilitate the development and expansion of State-SWC partnerships. Provide feedback and guidance. The Annual SWP meeting was in May 2015 in St. Paul, MN.</p> <p>US EPA encourages interstate communication through conference calls and an annual State–Region 5 EPA meeting.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p> <p>EPA Response: IEPA had limited participation by phone in the 2015 SWP meeting and is encouraged to increase its participation in future SWP meetings.</p>

Table 2. Other Activities

Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
<p>4.3 – Report the number of CWSs with SWP plans and the number of CWSs implementing SWP measures (electronically via SDWIS, if possible).</p> <p>For states that do not report via SDWIS, R5 requests that States voluntarily provide a list of system names and/or PWSID numbers that have SWP plans in place and a list of system names and/or PWSID numbers that are substantially implementing SWP as defined by the State as of the end of FY 2012.</p>	<p>Illinois EPA- Groundwater Section staff is updating source water assessments and will evaluate the most efficient mechanism to report program measures to the USEPA-Region 5.</p> <p>The Illinois EPA loads data into SDWIS such that it can be used to report implementation progress.</p>	<p>Maintain and update State information in the Region 5 portion of the annual SWP report to EPA-HQ.</p> <p>For 2012: % of CWS with minimized risk b/c of SWP 46.5%. Target not met. 50% of population served by CWSs with minimized risk b/c of SWP 69.8%, which exceeds the target of 42%.</p> <p>For 2013: 47% of CWS with minimized risk b/c of SWP. Target of 47% met. 70% of population served by CWS with minimized risk b/c of SWP. Target of 71% almost met.</p> <p>For 2014: 46.7% of CWS with minimized risk b/c of SWP. Target of 45% met. 69.8% of population served by CWS with minimized risk b/c of SWP. Target of 42% met.</p> <p>For 2015: 49.1% of CWS with minimized risk b/c of SWP. Target of 47% met. 72.9% of population served by CWS with minimized risk b/c of SWP. Target of 67% met.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.4 – Develop and implement coordinated approaches with other regulatory and voluntary programs to protect both the quality and quantity of source water, particularly in areas of concern.	Illinois EPA continues to actively coordinate program activities between Clean and Safe Drinking Water Act program, both within the Bureau of Water. Such activities include coordination on Clean Water Act Section 319, Mine Program, NPDES and sludge application programs. Additionally, the Interagency Coordinating Committee and Groundwater Advisory Council continue to meet on a quarterly basis which brings together planning impetus with Agricultural and Resource based Agencies as well as Regulatory Program areas.	<p>Provide training, technical assistance, and technology transfer capabilities.</p> <p>Facilitate the adoption and sharing of Geographic Information System databases to support local decision making.</p> <p>Work with Clean Water Act program to encourage assessment of surface waters for drinking water use, prioritize impaired waters, develop TMDLs, and develop tailored approaches to achieve substantial implementation. Enhance SWP integration elements like the watershed approach, stormwater management, and prioritized enforcement inspections based on SWP.</p> <p>Work with the state to characterize current and future pressures on source water quality and availability. Support voluntary programs such as WaterSense and other Sustainable Infrastructure activities to protect water resources.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
4.0 – Source Water Assessments and Protection			
4.5 – Develop and expand SWP program implementation mechanisms, where possible.	Ongoing – will continue.	Promote the innovative use of DWSRF set-asides and other potential program funding streams.	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
5.0 – DWSRF			
5.1 – Implement all required activities.	Ongoing – will continue.	<p>Review IUP and set-aside workplans.</p> <p>Ensure the set-aside funds are spent in a timely manner or transferred to the Loan Fund and then banked for future use.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>
Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
6.0 – Conduct Joint Assessment of Program Progress Using the PWSS Program Implementation Report			
6.1 – Review the draft report prepared by R5 and assist in filling gaps related to the State's PWSS program to support the various components of the PWSS program implementation logic model.	Illinois EPA will continue to coordinate with USEPA Region 5.	<p>Use the logic model to improve our ability to understand measure, assess, and communicate progress.</p> <p>SPM will work with state program to determine state-specific approach, and schedule.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
7.0 – Sustainable Infrastructure			
7.1 – Enable water system and water supply sustainability by providing incentives through DWSRF set-asides and grant criteria, providing training, and encouraging sustainable water infrastructure (SWI) activities including, for example, those related to water and/or energy efficiency, asset management, and climate change adaptation and mitigation activities. SWI is important to the success of other activities in this work plan, including source water protection, DWSRF, operator certification, capacity development, and all-hazards resilience approaches, etc.	Illinois is evaluating continuing the small systems compliance grant program. This program is designed to provide financial capacity by awarding grants to very small community water supplies. This grant program was initially funded through DWSRF loan repayments. Funding sources are being evaluated at this time for continuation of the program.	<p>Participates in a region-wide SWI workgroup created to develop and share information about the cost savings and benefits of investments in SWI initiatives, including WaterSense.</p> <p>Participate in regional and national EPA climate change adaptation/mitigation workgroups that share information about ongoing initiatives.</p> <p>► Region 5 to contact states to identify what, if any, sustainable water infrastructure/climate change efforts are a priority.</p>	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Table 2. Other Activities			
Other Activity Components	State Commitment	Region 5 Activities	State/U.S. EPA Evaluation
8.0 – Environmental Justice			
8.1 Provide incentives through DWSRF set-asides and grant criteria or otherwise promote and encourage environmental justice, for example, by targeting enforcement in communities with environmental justice concerns.	Ongoing – will continue.	Region 5 has the capability to provide states with draft GIS maps that show areas with environmental justice concerns through EJSCREEN, which will be introduced to the states by late summer 2014. States currently have access to the public tool, EJView, available online at: http://epa-hap14.epa.gov/ejmap/entry.html .	<p>2014 Status: The Illinois EPA commitment is unchanged.</p> <p>2015 Status: Status unchanged from 2014.</p>

Attachment A: Linking the Strategic Plan to this Work Plan

This continuing program grant is consistent with U.S. EPA's Strategic Plan Goal 2: Clean and Safe Water, which calls for protecting public health by providing safe drinking water. Many of the grant work plan activities contribute to the goal of assuring that people served by public water systems receive drinking water that meets all applicable standards through effective treatment and source water protection. Continuing program implementation includes adopting rules at least as stringent as federal regulations, providing assistance to public water systems on regulatory requirements, conducting sanitary surveys, ensuring that monitoring and follow-up is conducted, and enforcing regulations.

**Table A. Final FY 2014 National Water Program Guidance:
OW and OECA National Program Manager (NPM) Guidance Targets and Program Activity Measures**

NOTE: The information in the table below is based on final FY2014 measures at http://www.epa.gov/planandbudget/annualplan/FY14_OW_NPM_Gdnce.pdf, http://www.epa.gov/planandbudget/annualplan/FY14_OECA_NPM_Gdnce.pdf, and <http://www.epa.gov/ace/contaminants/#drinking>.

OW ACS code	Goal 2: Clean and Safe Water Subobjective 2.1.1: Water Safe to Drink
SDW-211	By FY2014, 90 percent of the population served by CWSs will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection. State FY14 and 15 target:
SDW-SP1.N11	By FY2014, 90 percent of the CWSs will meet all applicable health-based standards through approaches that include effective treatment and source water protection. State FY14 and 15 target:
SDW-SP2	By FY2014, CWSs will provide drinking water that meets all applicable health-based drinking water standards during 95 percent of "person months" (i.e., all persons served by CWSs times 12 months). State FY14 and 15 target:
SDW-SP4a	By FY2014, minimize risk to public health through source water protection for 50 percent of CWSs (i.e., "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-SP4b	By FY2014, minimize risk to public health through source water protection for 42 percent of the population served by CWSs (i.e., "minimized risk" achieved by substantial implementation, as determined by the state, of actions in a source water protection strategy). State FY14 and 15 target:
SDW-01a	By FY2014, 90 percent of CWSs that have undergone a sanitary survey within the past three years (five years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules and the Ground Water Rule. State FY14 and 15 target:

OW ACS	Goal 2: Clean and Safe Water
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code	Subobjective 2.1.1: Water Safe to Drink
SDW-03	Percent of the lead action level data for the Lead and Copper Rule for CWS serving over 3,300 people that is complete in SDWIS-FED. This is an indicator that HQ reports.
SDW-04	In FY2014, achieve an 89 percent fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF). HQ reports.
SDW-05	The number of DWSRF projects that have initiated operations (cumulative). HQ reports.
SDW-11	Percent of DWSRF projects awarded to small PWSs serving <500, 501-3,300, and 3,301-10,000 consumers. This is an indicator that HQ reports.
SDW-12	Percent of DWSRF dollars awarded to small PWSs serving <500, 501-3,300, 3,301-10,000 consumers. This is an indicator that HQ reports.
SDW-13	Percent of DWSRF loans that include assistance to disadvantaged communities. This is an indicator that HQ reports.
SDW-14	Number and percent of CWSs and NTNCWSs, including new PWSs, serving fewer than 500 persons. (New PWS are those first reported to EPA in last calendar year). This is an indicator that HQ reports.
SDW-15	Number and percent of small CWSs and NTNCWSs (<500, 501-3,300, 3,301-10,000) with repeat health-based Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR violations. This is an indicator that HQ reports.
SDW-16	Average time for small PWSs (<500, 501-3,300, 3,301-10,000) to return to compliance with acute Nitrate/Nitrite, Stage 1 D/DBP, SWTR and TCR health-based violations (based on state-reported RTC determination date). This is an indicator that HQ reports.

SDW-17	Number and percent of schools and childcare centers that meet all health-based drinking water standards. This is an indicator that HQ reports.
DECA ACS code	Goal 5: Compliance and Environmental Stewardship Subobjective 5.1.2: Address Environmental Problems from Water Pollution
5.1.2 (SDWA02)	During FY2014, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2013 ETT report ³ .
Measure	America's Children and the Environment, Third Edition (ACE3) Drinking Water Contaminants
E6	Percentage of children served by CWSs that did not meet all applicable health-based drinking water standards. This is an indicator that HQ reports.
E7	Percentage of children living in areas served by CWSs with violations of drinking water monitoring and reporting requirements. This is an indicator that HQ reports.

³ A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2014 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.

SHARED GOALS:

By 2016:

1. % of NTCWS meeting all health based standards CY 2006-12
2. % of TNCWS meeting all health-based standards CY 2006-12
3. % of TNCWS with significant/major monitoring v% of population served by CWS with significant/major monitoring violations CY2006-12
4. % of CWS with significant/major monitoring violations CY 2006-12
5. % of NTCWS with significant/major violations for acute health risks (NO3, microbial and SWT) CY 2006-12
6. % of NTCWS with significant/major monitoring violations for chronic health risks CY 2006-12
7. Violations CY 2006-12

Attachment B: Unregulated Contaminant Monitoring Rule**(UCMR) Partnership Agreement**

Illinois Environmental Protection Agency

U.S. Environmental Protection Agency Region 5

**PARTNERSHIP AGREEMENT for the IMPLEMENTATION of the
UNREGULATED CONTAMINANT MONITORING REGULATION (Cycle 3)****BACKGROUND**

The goal of the Unregulated Contaminant Monitoring Regulation (UCMR) under the Safe Drinking Water Act (SDWA) is to obtain reliable data concerning the occurrence of unregulated contaminants in drinking water as one step to determine whether or not to regulate them. The EPA is to make this determination in a public process with input from States and other stakeholders. Since EPA and the States and Tribes are partners in the implementation of any future regulations associated with these contaminants, they have a joint and mutual interest in obtaining the best data possible through the monitoring program under the UCMR.

EPA is proposing to require all public water systems (PWSs) serving more than 10,000 people, and a representative sample of 800 PWSs serving 10,000 or fewer people, to conduct Assessment Monitoring (List 1) for 28 chemicals during a 12-month period from January 2013 to December 2015. As under previous cycles of the UCMR, EPA would continue to conduct and pay for the monitoring required for those selected PWSs serving 10,000 or fewer people. As proposed, UCMR3 does not include any contaminants to be monitored in a Screening Survey (List 2). If the final UCMR3 does not include a Screening Survey, then the State will not need to perform any tasks in this Partnership Agreement pertaining to the List 2 monitoring. Additionally, 800 small vulnerable nondisinfesting groundwater PWSs serving 1,000 or fewer people will be required to conduct the Pre-Screen Testing (List 3) for 2 virus contaminants and 5 indicator variables. Since this monitoring requires specialized sampling and is only being conducted at small systems, the EPA's Office of Ground Water and Drinking Water (OGWDW) will coordinate the monitoring at the selected sites. The Pre-Screen Testing will be conducted during a 12-month period between January 2013 and December 2015.

States have requested to assist the EPA in implementation of this regulation through a "memorandum of agreement," which is represented by this Partnership Agreement (PA). Consistent with the flexibility provided by the SDWA, the revised UCMR is not to be adopted by each State or carried out as part of each State's primacy responsibilities. However, there are specific responsibilities that a State could carry out as part of a PA with the EPA to ensure that the national database receives the best information on unregulated contaminants for future regulatory efforts. As a result, the EPA has developed this model PA. The PA will be used by the EPA Regional Offices and the States to establish the extent to which the State will participate in the preparation for and the implementation of the UCMR.

PURPOSE

This PA is intended to support the implementation of the UCMR by identifying the key implementation activities which will be performed by the State for the third UCMR monitoring cycle (UCMR3). While States are not responsible for implementing the UCMR, the Association of State Drinking Water Administrators (ASDWA) and the EPA encourage States to assist the EPA to the extent feasible as the activities in this PA are implemented. The principal agent within the EPA's OGWDW charged with

implementation responsibility for the UCMR is the Technical Support Center (TSC), located in Cincinnati, Ohio. A key role of the EPA Regional Office is to establish an agreement with States; identifying what each State will do to implement specific provisions of the regulation. The extent to which the State engages in implementing the UCMR jointly with the EPA will depend on many considerations. If a State wishes to participate in UCMR implementation, the State must agree to carry out the review of the initial State Monitoring Plan, as provided in Section 1445(a)(2)(C)(I) of SDWA. This role is provided in Part 1, Necessary Responsibilities, of the attached agreement. The State may elect to assume additional responsibilities over and above those identified in Part 1 in assisting the EPA's direct implementation responsibility for the UCMR. These other responsibilities are identified in Part 2, Supplemental Responsibilities. These are to be determined through discussions between Regions and each State.

To implement the UCMR in an orderly and timely fashion, this PA must be signed by **June 30, 2011**. If it is not signed by that date, it will be assumed that the State is not partnering with the EPA to implement the UCMR3.

RATIONALE

The basis for this PA to implement the regulations at 40 CFR 141.35 and 141.40 is Section 1445(a)(2)(C) of the SDWA and the expressed desire of States to support the EPA's receipt of high quality data through their participation. Specifically, States indicated their desire to work with public water systems concerning their monitoring responsibilities and generally expressed a willingness to assist the EPA in implementing the UCMR.

LIMITATIONS

All commitments made in this PA are subject to the availability of funds. The parties agree that they will bear their own cost of participation in the PA.

This PA does not create any right or benefit, substantive or procedural, against the parties, their officers or employees, or any other person.

MODIFICATION NOTIFICATION

If for whatever reason the State will not be able to complete any task agreed to in this PA, the State should notify the Technical Support Center and the relevant EPA Regional Office as soon as possible to avoid confusion and implementation delays.

UCMR IMPLEMENTATION: ROLES AND RESPONSIBILITIES

The tasks listed below identify activities that may be carried out by the State under the PA. The list is organized in two parts that address, respectively, necessary and supplemental activities. If a State desires to enter into a PA, the State must agree to review the SMP, with the option to provide assistance with the other responsibilities in Part 2. Part 2 has important functions to be undertaken which may be most effectively performed by the State.

Please place a mark next to each activity for which the State will take responsibility.

Part 1- Necessary Responsibilities

1. X Review the draft State Monitoring Plan (SMP) to verify proper classification of public water systems (PWSs). The SMP is a comprehensive list of community and nontransient, noncommunity water systems, including: 1) all large PWSs (serving >10,000 persons), and EPA-selected small PWSs (serving <10,001 persons) that must conduct Assessment Monitoring; 2) all EPA-selected small PWSs that must conduct the Pre-Screen Testing; and possibly 3) all very

large PWSs and EPA-selected small and large PWSs that must conduct Screening Surveys. The SMP must be returned to the EPA/TSC within 60 days of receipt of the draft SMP.

Part 2 - Supplemental Responsibilities

2. X Provide (or ensure) the proper PWS inventory data (PWSID, facility ID and sample point ID) for each PWS to use for reporting their monitoring data in the Safe Drinking Water Accession and Review System (SDWARS). This may include initially providing the complete inventory and correcting or adding facilities and/or sample points, when necessary.
3. Review representative sampling plans for reduced monitoring submitted by PWSs with groundwater sources that have multiple entry points to the distribution system. Inform the EPA of the State's approval, modification, or disapproval. **If the EPA does not receive your recommendation within 60 days of your receiving the PWS's proposed representative groundwater wells monitoring plan, then the EPA will assume State concurrence.**
4. Notify large PWSs of their Assessment Monitoring and/or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify large systems.**
5. Notify small PWSs that are part of the final SMP of their Assessment Monitoring or Screening Survey responsibilities within 30 days of receiving your final SMP. Within 30 days of notification, provide the EPA/TSC with a list of the notified PWSs. **If the EPA does not receive your list of notified PWSs within 60 days of your final SMP, then the EPA will notify small systems.**
6. Notify the EPA/TSC at least 6 months before monitoring is to occur that the State will perform the sampling for the small PWSs in the SMP for Assessment Monitoring and/or Screening Surveys. **If the EPA does not hear from you by this deadline, then the EPA will assume the PWSs will perform the sampling.**
7. Specify an alternate monitoring date, if the State is going to collect samples for small PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**
8. If the State is going to collect large PWSs samples, assign the monitoring schedule for the large PWSs. **If this schedule is not returned with the SMP under Part 1 of this PA, then the EPA will assume the previously assigned schedule.**
9. Assist the EPA in obtaining compliance through follow-up contact with PWSs concerning their monitoring responsibilities and concerning instances of noncompliance.

Illinois Program Work Plan for Calendar Years 2014-2016

**Agreement Between
Illinois Environmental Protection Agency and Region 5, U.S. Environmental Protection
Agency**

Pursuant to federal assistance statutes, the Illinois Environmental Protection Agency (Illinois EPA) and Region 5, U.S. Environmental Protection Agency (EPA Region 5) work together to implement authorized, delegated, and/or approved environmental programs within the State of Illinois in a timely, appropriate, and effective manner. Together we establish priorities, negotiate program commitments and work sharing, and evaluate program performance. Illinois EPA and EPA Region 5 are replacing the previous Work Plan Agreement as a means to continue our partnership to strengthen Illinois' NPDES permitting for CAFOs and to significantly reduce the Clean Air Act Permit Program permit backlog. The Work Plan for 2014-2016 includes activities and commitments for both Agencies relating to the Clean Water Act National Pollutant Discharge Elimination System (NPDES) and Clean Air Act Title V permitting program. Illinois EPA and EPA Region 5 will monitor progress under the Work Plan Agreement via existing program-to-program communications, as well as during the annual joint senior management planning meeting. The Work Plan may be adjusted by mutual agreement.

The execution of this Agreement demonstrates our continuing commitment to environmental improvement through a strong partnership and shared responsibility for meeting our regulatory obligations.


Entered into on 9/5/2014

For Illinois EPA:



Lisa Bonnett, Director
Illinois Environmental Protection Agency

For EPA Region 5:



Susan Hedman
Regional Administrator

Illinois Program Work Plan

For Calendar Years 2014 -2016 Water Programs

In March 2008, the Illinois Citizens for Clean Air & Water (Illinois Citizens) submitted a petition to the U.S. Environmental Protection Agency (U.S. EPA) requesting the withdrawal of Illinois' authorized Clean Water Act National Pollutant Discharge Elimination System (NPDES) program. Illinois Citizens contend that the Illinois Environmental Protection Agency (Illinois EPA) was not properly administering the NPDES program for concentrated animal feeding operations (CAFOs). In February 2009, Illinois Citizens, joined by the Environmental Integrity Project, provided additional information in a supplementary petition to U.S. EPA.

U.S. EPA conducted an informal investigation of the petitioners' allegations and issued a report in September 2010¹. The report discusses U.S. EPA's initial findings for the various program areas, and the actions that Illinois EPA must take to comply with Clean Water Act requirements for authorized state NPDES programs. In particular, Illinois EPA must accomplish the following:

NPDES Permitting for CAFOs

- Issue NPDES permits to CAFOs that are required to be permitted under NPDES regulations.
- Develop and maintain a comprehensive inventory of CAFOs and evaluate their regulatory status.
- Establish technical standards for nutrient management by large CAFOs and revise title 35 of the Illinois Administrative Code, Subtitle E, as necessary to be consistent with the federal CAFO rules.
- Ensure that sufficient resources are maintained to issue or deny permits.

NPDES Compliance Monitoring and Enforcement for CAFOs

- Revise the inspection process for livestock and poultry facilities to enable Illinois EPA to determine and track whether inspected facilities are CAFOs that are required to have NPDES permits and whether they are in compliance with NPDES requirements.
- Develop standard operating procedures and properly investigate, track, and respond to citizen complaints reporting potential violations of NPDES requirements.
- Take timely and appropriate enforcement action to address noncompliance by CAFOs.

¹See the "Initial Results of an Informal Investigation of the National Pollutant Discharge Elimination System Program for Concentrated Animal Feeding Operations in the State of Illinois" (Initial Results), available at: <http://www.epa.gov/region5/illinoisworkplan/>.

- Require that Illinois EPA enforcement actions address CAFOs failing to apply for an NPDES permit, where a facility has discharged, is discharging, or is designed, constructed, operated, or maintained such that it will discharge.
- Ensure that sufficient resources are maintained for inspections and enforcement of NPDES requirements for CAFOs.

Progress to date and plan forward

- Since February 2011, Illinois EPA has hired and trained new CAFO staff; made progress on issuing, reinvestigating and tracking CAFO permits; has developed an inventory of large CAFOs; has made progress on conducting and tracking CAFO inspections; has issued violation notices and referred actions to the Illinois Attorney General's Office; has submitted proposed amendments to Title 35 of the Illinois Administrative Code to the Illinois Pollution Control Board; has developed and implemented standard operating procedures; and has developed and implemented its Enforcement Response Guidelines related to inspections and enforcement.
- Both Illinois EPA and U.S. EPA agree to extend the Work Plan Agreement through calendar year 2016 to continue the progress to meet the Objectives established in the 2011 and 2013 Work Plan Agreements.

The following are specific actions that Illinois EPA and U.S. EPA will continue to take to address the initial findings in U.S. EPA's report:

1. To ensure consistency with the Clean Water Act requirements, Illinois EPA will devote sufficient staff to implementation of the CAFO NPDES permitting and enforcement programs. At all times, Illinois EPA will ensure that sufficient resources are maintained to issue or deny permits expeditiously.
2. Within 60 days of receipt of U.S. EPA's review of Illinois EPA's final workload assessment, Illinois EPA will submit a revised final workload assessment.
3. Illinois EPA will continue to provide U.S. EPA with a bi-monthly status report on each CAFO permit application. Any future changes to the current version of the status report shall be mutually agreed upon by Illinois EPA and U.S. EPA.
4. Within 90 days following publication of amendments to 35 Ill. Adm. Code, subtitle E, Illinois EPA and U.S. EPA will jointly identify permit conditions that Illinois EPA could modify and practices that Illinois EPA could adopt, consistent with the 2003 and 2008 federal rules for CAFOs, to streamline the process for review of Nutrient Management Plans (NMPs) and incorporation of NMP terms into permits. For any conditions or practices so identified, Illinois EPA will act to modify the conditions or adopt the practices in accordance with a mutually agreed upon schedule.
5. Within 90 days following publication of amendments to 35 Ill. Adm. Code, subtitle E, Illinois EPA will submit to U.S. EPA for approval or approval with modification revisions to the March 2013 Standard Operating Procedure (SOP) for CAFO NPDES Permits so the SOP is consistent with the published amendments.
6. For permit applications submitted prior to March 31, 2011, Illinois EPA will either issue or deny permits to applicants or refer the matter to the Illinois Attorney General's office for formal enforcement or to U.S. EPA for an information collection order by December 31, 2014. For all other permit applicants, Illinois EPA will take action in accordance with its approved SOP for CAFO NPDES Permits.
7. Within 90 days after publication of amendments to 35 Ill. Adm. Code, subtitle E, Illinois EPA will inform the owner of each Large CAFO in the State's inventory, in writing, about the unpermitted discharge prohibition and the duty to apply for a permit, and the potential consequences for discharge without a permit. Illinois EPA will provide a draft of the letter to U.S. EPA for review and approval or approval with modification.
8. Within 60 days after the amendatory rulemaking becomes effective, Illinois EPA will submit the final amendments to U.S. EPA for action under 40 C.F.R. §123.62.
9. Within 120 days after the effective date of the amendatory rulemaking, Illinois EPA will revise its permit application forms and formally ask the public to comment on draft modifications to general permitILA01, as appropriate, based on the amendments and the federal regulations.
10. Illinois EPA will update and submit to U.S. EPA its Large CAFO inventory by August 31 and February 28 each year. By these same dates, Illinois EPA will ensure that the updated inventory is available to all Illinois EPA staff and the public in an easily accessible format. The inventory will include all confirmed Large and permitted CAFO sites identified by Illinois EPA based on information in permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, and the Illinois Department of Public Health.
11. By October 31, 2014, Illinois EPA will submit a plan to maintain the inventory. The plan will specify how Illinois EPA will maintain the inventory including a process of confirming sizes and whether discharges are occurring at unpermitted large and medium livestock facilities and documenting the determinations. The plan will also include the process to get updates from the Illinois Department of Agriculture and Illinois Department of Public Health. Within 60 days of receipt of U.S. EPA's review of Illinois EPA's plan, Illinois EPA will submit a final plan.
12. Each year between October 1 and September 30, U.S. EPA will conduct 2 oversight inspections of Illinois EPA NPDES CAFO inspections to evaluate the effectiveness of the Illinois EPA inspection program. U.S. EPA inspectors will document their findings, and evaluate the thoroughness and scope of prior Illinois EPA inspections as well as the appropriateness of the record-keeping and reporting associated with the inspections. U.S. EPA will provide copies of these inspection reports to Illinois EPA within 60 days of completion.